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Introduction + Purpose

Each school day, our Nation’s schools are entrusted to provide a **safe and healthy learning environment** for approximately **55 million** elementary and secondary school students¹ in public and nonpublic schools. **Families** and **communities** expect schools to keep their children and youths **safe** from **threats (human-caused emergencies** such as crime and violence) and **hazards (natural disasters, disease outbreaks and accidents)**.

In collaboration with their **local government** and **community partners**, schools can take steps to plan for these potential emergencies through the creation of a **school emergency operations plan (EOP)**.

Lessons learned from school emergencies highlight the **importance** of preparing school officials and first responders to implement emergency operations plans. By having plans in place to keep students and staff safe, schools play a key role in taking **preventative and protective measures** to *stop* an emergency from occurring or *reduce* the impacts of an incident.

Although schools are **not** traditional **response organizations**, when a school-based emergency occurs, school personnel respond immediately. They provide **first aid, notify response partners** and provide **instructions** before first responders arrive. They also work with community partners – governmental organizations that have a responsibility in the school emergency operations plan to provide a **cohesive, coordinated response**. Community partners include **first responders** (law enforcement officers, fire service officials, emergency medical services (EMS) personnel) and other emergency management professionals, as well as **public and mental health** entities in public and nonpublic schools.

We recommend that planning teams responsible for developing and revising school EOPs use this document to **guide** their **efforts**. It is recommended that **districts** and **individual schools** compare *existing* plans and processes against the content and processes outlined in this Guide. To gain the most from it, users should read through the entire document *prior* to initiating planning efforts and then refer back to it *throughout* the planning process.

As the team that developed this Guide began its work to respond to the President’s call for model emergency management plans for schools, it became clear that there is a need to help ensure that our **schools’ emergency planning efforts** are **aligned** with the **emergency planning** practices at the local, **State** and **National** levels. Recent developments have put a new emphasis on the process for developing EOPs.

The Guide Is Organized In Four (4) Sections:

- **Principles** of school emergency management planning.
- Process for **developing, implementing** and *continually refining* a school EOP with community partners at the school building level.
- Discussion of the **form, function** and **content** of school EOPs.
- *A Closer Look*, which considers **key topics** that support school emergency planning, includes addressing an active shooter, school climate, psychological first aid and information-sharing.

¹U.S. Department of Education, National Center for Education Statistics, *Digest of Education Statistics 2011*. Washington, DC: Author, 2012. Available at <http://nces.ed.gov/programs/digest/d11/index.asp>.





National preparedness efforts, including planning, are now informed by **Presidential Policy Directive-8 (PPD-8)**, which was signed by the President in **March 2011**. PPD-8 describes the Nation’s **approach** to preparedness. This directive represents an **evolution** in our **collective understanding** of national preparedness, based on the lessons learned from terrorist attacks, hurricanes, school incidents and other experiences.

Emergency management officials and emergency responders engaging with schools are familiar with this terminology. These **mission areas** generally **align** with the **three (3) timeframes** associated with an incident: *before, during and after*.

The majority of prevention, protection and mitigation activities generally occur *before* an incident, although these **three (3) mission areas** do have *ongoing* activities that can occur throughout an incident. Response activities occur *during* an incident, and recovery activities can begin *during* an incident and occur *after* an incident.

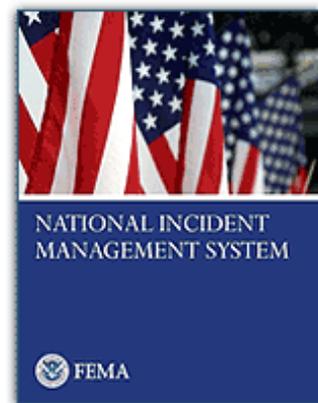
As schools plan for and execute response and recovery activities through their EOP, they should use the concepts and principles of the **National Incident Management System (NIMS)**. One component of NIMS is the **Incident Command System (ICS)**, which provides a **standardized approach for incident management**, regardless of cause, size, location or complexity. By using ICS during an incident, schools are able to more effectively **work** with responders in their communities. For more information on ICS and NIMS, visit <https://www.fema.gov/national-incident-management-system>

While some of the vocabulary, processes and approaches discussed in this Guide may be new to the education community, they are **critical**. The **vocabulary, processes and approaches** are *critical* to the creation of emergency management practices and plans that are **integrated** with the efforts of first responders and other key stakeholders, and that incorporate everything possible to keep **children safe**. If a school system has an *existing* plan, **revising** and **adapting** that plan using the principles and process described in this Guide will help ensure alignment with the terminology and approaches used across the Nation.

The State of Louisiana is providing **examples of good practices** and matters to consider for **planning and implementation** purposes. The guidance does *not* create any requirements beyond those included in applicable law and regulations, or create any *additional* rights for any person, entity or organization. The information presented in this document generally constitutes **informal guidance**

PPD-8 defines preparedness around **five (5) mission areas**: Prevention, Protection, Mitigation, Response, and Recovery.

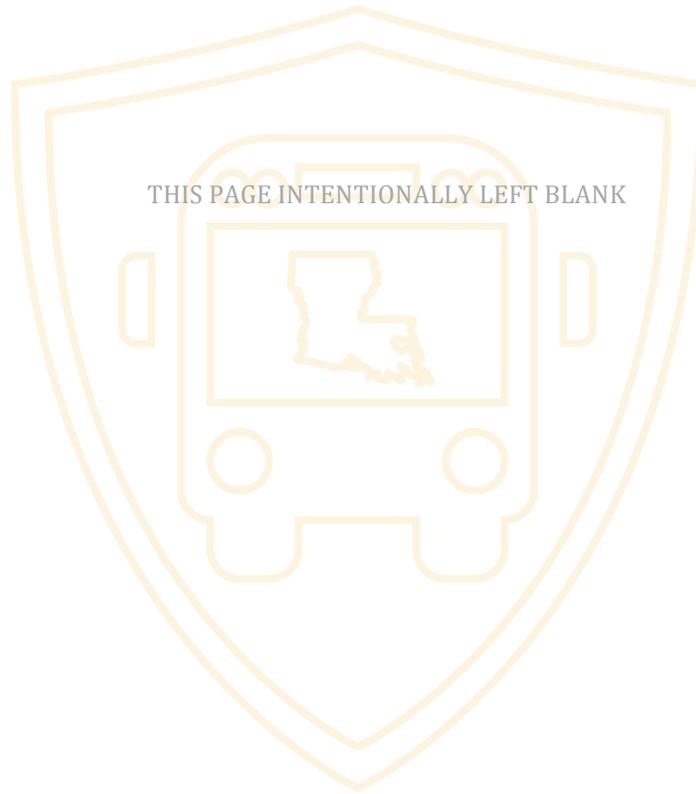
- **Prevention**, for the purposes of this guide, means the capabilities necessary to **avoid, deter or stop** an imminent crime or threatened or actual mass casualty incident. Prevention is the action schools take to prevent a threatened or actual incident from occurring.
- **Protection** means the capabilities to secure schools against acts of violence and manmade or natural disasters. Protection focuses on ongoing actions that protect **students, teachers, staff, visitors, networks and property** from a threat or hazard.
- **Mitigation** means the capabilities necessary to **eliminate or reduce** the loss of life and property damage by lessening the impact of an event or emergency. In this document, “mitigation” also means **reducing** the likelihood that threats and hazards will happen.
- **Response** means the capabilities necessary to stabilize an emergency once it has already happened or is certain to happen in an unpreventable way; establish a safe and secure environment; save lives and property; and facilitate the transition to recovery.
- **Recovery** means the capabilities necessary to **assist** schools affected by an event or emergency in **restoring** the learning environment.





and provides examples that may be helpful. The inclusion of certain references does not imply any endorsement of any documents, products or approaches. There may be other resources that are *equally* helpful.







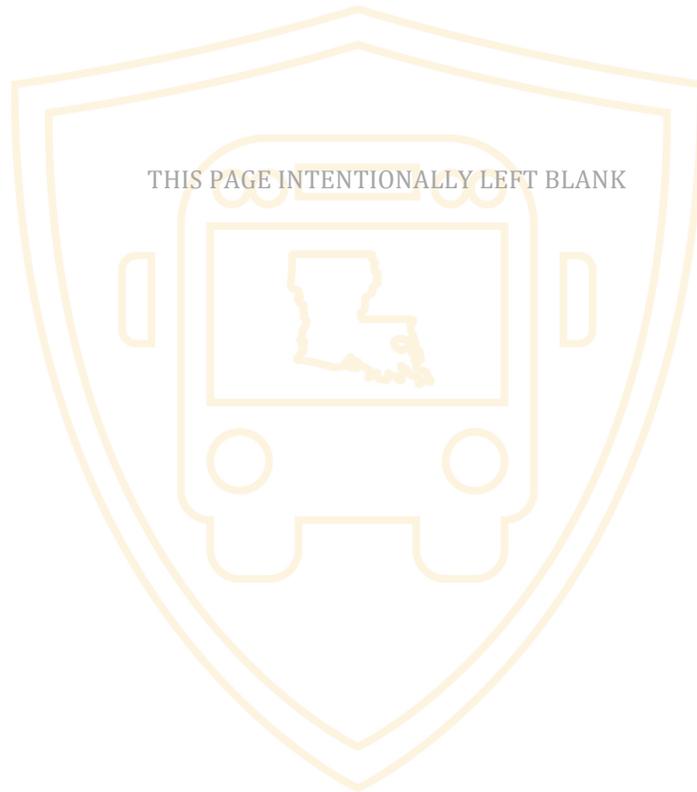
Planning Principles

The following **principles** are key to developing a **comprehensive** and high-quality **EOP** that addresses a *range* of **threats** and **hazards**:

Table 1: PLANNING PRINCIPLES

<ul style="list-style-type: none"> • Planning must be supported by leadership. <p>At the district and school levels, senior-level officials help the planning process by demonstrating strong support for the planning team.</p>
<ul style="list-style-type: none"> • Planning uses assessment to customize plans to the building level. <p>Effective planning is built around comprehensive, ongoing assessment of the school community. Information gathered through assessment is used to customize plans to the building level, taking into consideration the school's unique circumstances and resources.</p>
<ul style="list-style-type: none"> • Planning considers all threats and hazards. <p>The planning process must take into account a wide range of possible threats and hazards that may impact the school. Comprehensive school emergency management planning considers <i>all</i> threats and hazards throughout the planning process, addressing safety needs <i>before, during</i> and <i>after</i> an incident.</p>
<ul style="list-style-type: none"> • Planning provides for the access and functional needs of the whole school community. <p>The "whole school community" includes children; individuals with disabilities and others with access and functional needs; those from religiously, racially and ethnically diverse backgrounds and people with limited English proficiency (LEP).</p>
<ul style="list-style-type: none"> • Planning considers all settings and all times. <p>School EOPs must account for incidents that may occur <i>during</i> and <i>outside</i> the school day as well as on and off campus, for example at sporting events or field trips.</p>
<ul style="list-style-type: none"> • Creating and revising a model EOP is done by following a collaborative process. <p>This Guide provides a process, plan format and content guidance that are flexible enough for use by <i>all</i> school emergency planning teams. If a planning team also uses templates, it must <i>first evaluate</i> their usefulness to ensure the tools do not undermine the collaborative initiative and collectively shared plan. There are some jurisdictions that provide templates to schools, and these will reflect local and State mandates, as applicable.</p>







Planning Process

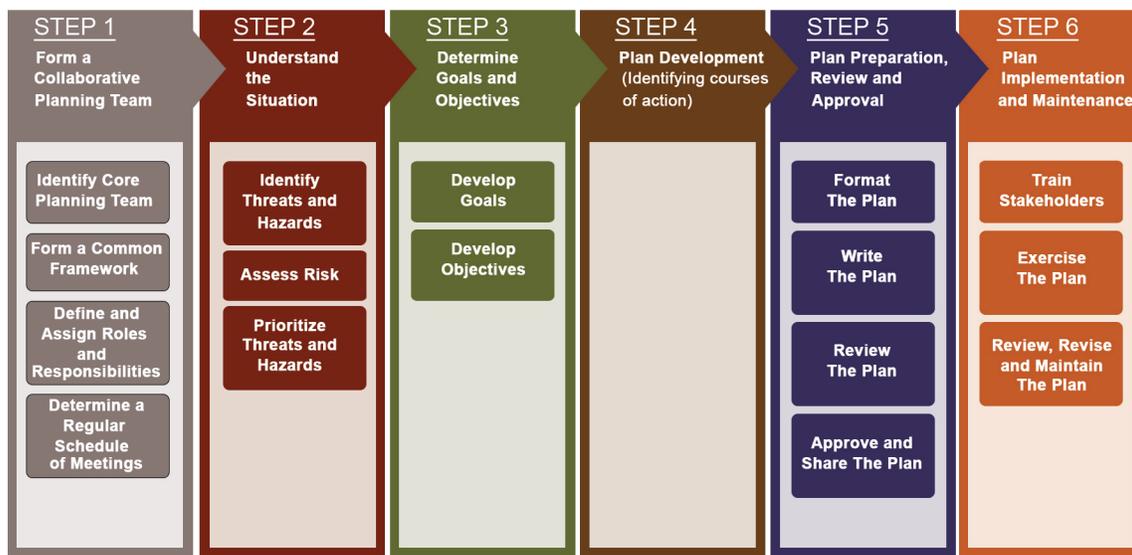
There are many ways to develop a school EOP. The planning process discussed in this section is **flexible** and can be **adapted** to accommodate a school’s **unique characteristics** and **situation**.

Effective school emergency management planning and development of a school EOP are *not* done in **isolation**. It is **critical** that schools work with their **district staff** and **community** partners – local **emergency management staff**, **first responders** and **public** and **mental health** officials – during the planning process. An effective school EOP is supported at the district level and integrated with **district**, **community**, **regional** and **State** plans. This collaboration makes more resources available and helps to ensure the **seamless integration** of all responders.

Schools can use the process outlined below to **develop** a plan, do a **comprehensive review** of their entire plan, or conduct **periodic** and **incremental** reviews of the plan’s components. While this Guide is designed for schools, districts may use this planning process as well.

Figure 1 depicts the **six (6) steps** in the planning process.² At each step, schools should consider the **impact** of their **decisions** on ongoing activities such as **training** and **exercises** as well as on **equipment** and **resources**.

Figure 1: STEPS IN THE PLANNING PROCESS



²U.S. Department of Homeland Security, Federal Emergency Management Agency. *Developing and Maintaining Emergency Operations Plans: Comprehensive Preparedness Guide 101, Version 2.0*. Washington, DC: Author, November 2010. Available at http://www.fema.gov/pdf/about/divisions/npd/CPG_101_V2.pdf.







Step 1: Form A Collaborative Planning Team

Discussion

Lessons learned from experience **indicate** that operational **planning** is best performed by a **team**. Case studies reinforce this concept by pointing out that the common thread found in successful operations is that participating organizations **understand** and **accept** their **roles**. Close **collaboration** between schools and community partners ensures the **coordination** of **efforts** and the **integration** of emergency management plans.

Action Steps

□ Identify Core Planning Team

The core planning team should include representatives from a wide range of school personnel, including, but not limited to, **administrators**, **educators**, school **psychologists**, **nurses**, **facilities** managers, **transportation** managers, **food** personnel and **family services** representatives. It should

Figure 2: TEAM APPROACH



also include **student** and **parent** representatives; individuals and organizations that serve and represent the interests of students, staff and parents with disabilities and others with **access** and **functional needs**; as well as **racial minorities** and **religious** organizations, so that specific concerns are included in the *early* stages of planning.

In addition, the core planning team should include **community partners** such as **first responders**, local **emergency management staff** and others who have **roles** and **responsibilities** in school emergency management

before, during and *after* an incident. This includes local **law enforcement** officers, **emergency medical services** (EMS) personnel, emergency management professionals, school **resource officers**, **fire service** officials, **public** and **mental health** practitioners and local **emergency managers**. Their expertise will inform the development, implementation and refinement of the school EOP.

The planning team should be small enough to permit **close collaboration** with first responders and other community partners, yet large enough to be **representative** of the school, its families, and its community. It should also be large enough as to not place an undue burden on any single person.

□ Form A Common Framework

A shared approach facilitates **mutual understanding**, **coordination** and **execution** of the emergency management strategies as well as works from a **common command structure**. All team members need to take time to learn each other's terminology, command structure and culture in order to facilitate effective planning.

Figure 3: COLLABORATIVE INCIDENT MANAGEMENT





Connecting The Planning Team To District + Local Or Regional + State + Tribal + Federal Emergency Planning

Schools undertake emergency operations planning within the context of district, local or regional, State, Tribal, and Federal agency emergency planning. School districts serve as the liaison between the school and these broader agencies. In order to promote coordination between these entities, the planning team is strongly encouraged to include a district representative. The local school district's emergency planning policies, procedures and training activities will inform and enhance individual school planning to a significant degree.

In addition, from the onset, the planning team should be aware of any local or State requirements that may apply to the school EOP.

□ Define + Assign Roles + Responsibilities

Each person involved in the development and refinement of the plan should know their **roles** and **responsibilities** in the planning process.

□ Determine A Regular Schedule Of Meetings

School emergency management planning is an ongoing effort that is reinforced through **regularly scheduled** planning **meetings**. Establishing a **flexible** but **regular** schedule of meeting times **facilitates** greater **collaboration**, **coordination** and **communication** among team members and helps solidify crucial relationships.

Step 1: Outcome

After completing Step 1, the school has formed a planning team with representatives from all necessary stakeholders. The planning team has taken *initial* steps to form a **common framework**, **define** and **assign roles** and **responsibilities** in the planning process and set a schedule of planning meetings.





Step 2: Understand The Situation

Discussion

In Step 2, the planning team **identifies** possible threats and hazards and **assesses** the risk and vulnerabilities posed by those threats and hazards.

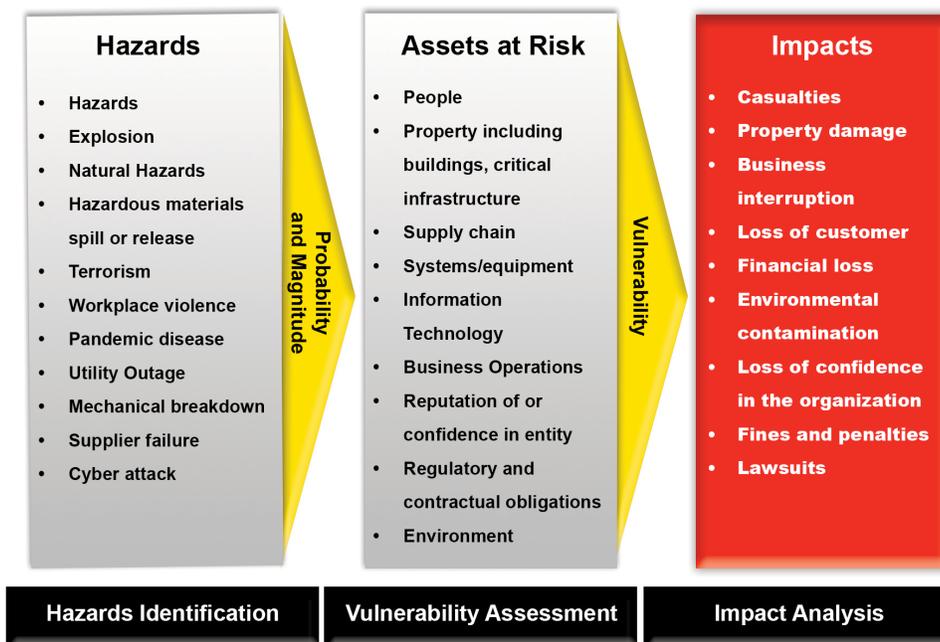
Effective school planning depends on a **consistent analysis** and **comparison** of the threats and hazards a particular school faces. This is typically performed through a threat and hazard identification and risk assessment process that **collects information** about threats and hazards, and **assigns values** to risk for the purposes of deciding which threats or hazards the plan should *prioritize* and subsequently address.

Action Steps

□ Identify Threats + Hazards

The planning team first needs to **understand** the threats and hazards faced by the school and the surrounding community.

Table 2: THREATS + HAZARDS





The planning team can draw upon a wealth of *existing information* to identify the range of threats and hazards that may be faced by the school. First, the planning team members should **share** their own **knowledge** of threats and hazards the school and **surrounding community** have faced in the *past* or may face in the *future*. The planning team should then reach out to **local, State and Federal** agencies for data about historical threats and hazards faced by the surrounding community. Local and Parish agencies that have a knowledge of threats and hazards include, but are not limited to, local law enforcement and **emergency management** offices, as well as local organizations and **community groups** (such as the local chapter of the **American Red Cross (ARC) Community Emergency Response Team**), **utilities** and other **businesses** that can provide helpful information.

□ Assess The Risk Posed By The Identified Threats + Hazards

Once an initial set of threats and hazards have been identified through the process described in the previous section, the planning team selects suitable **assessment** tools to **evaluate** the risk posed by the identified threats and hazards.³

Evaluating risk entails:

- **Understanding** the **probability** that the specific threat or hazard will occur.
- The **effects** it will likely have, including the **severity** of the impact.
- The **time** the school will have to warn students and staff about the threat or hazard.
- How long it may last.

The local and Parish emergency management staff should be able to provide information on some of the **risks posed** by threats and hazards **common** to the school and surrounding community. This enables the planning team to **focus** its **assessment** efforts on threats and hazards *unique* to the school community, as well as on the particular **vulnerabilities** of the building and its occupants.

Vulnerabilities refers to the **characteristics** of the school – its structure, equipment, information technology (IT) or electrical systems, grounds, surrounding area – that could make it more **susceptible** to the identified threats and hazards. Assessing risk and vulnerability enables the planning team to **focus** its **efforts** on *prioritized* threats and hazards.

There are numerous assessments that the planning team may use, including **site assessments**, **culture** and **climate** assessments, school **behavioral** threat assessments and **capacity** assessments. These assessments help the planning team not only assess risk but also **identify resources** and **issues** that the plan may need to address. Through the assessment process, the planning team may also identify additional threats and hazards.



PLAN DEVELOPMENT TRAINING OPPORTUNITIES

³For more information on the threat and hazard identification and risk assessment process, please see FEMA's *Threat and Hazard Identification and Risk Assessment Guide (CPG 201)* at <http://www.fema.gov/plan>.





The most successful assessments are conducted by a **broad array** of individuals, including **support** staff and **first responders**. Students and parents – including students and parents with disabilities and others with access and functional needs – are included to the *maximum* extent appropriate. The assessment also has to be **strategic**: If the school is in an isolated region of a Parish and the response times for law enforcement officers or fire officials and EMS practitioners are lengthy, that may alter the **calculus** of the **assessment**. If response time is *lengthy*, **other security measures** may need to be enacted to compensate for lengthy response times.

Assessments are to **develop** the **initial plan** and also inform **updates** and **revisions** to the plan on an ongoing basis. The following table provides more information about some of the most essential assessments the planning team should undertake.⁴



⁴For more information on assessments and schools, see the Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center’s *A Guide to School Vulnerability Assessments* at http://rems.ed.gov/docs/va_report_2008.pdf.





Table 3: ASSESSMENT

Type Of Assessment	Description	Purpose + Results
<p>Site Assessment</p>	<ul style="list-style-type: none"> • A site assessment examines the safety, accessibility and emergency preparedness of the school’s buildings and grounds. This assessment includes: <ul style="list-style-type: none"> ○ Egress control measures. ○ Visibility around the exterior of the building. ○ Structural integrity of the building. ○ Compliance with applicable architectural standards for individuals with disabilities and others with functional and access needs. ○ Emergency vehicle access. 	<ul style="list-style-type: none"> • Increased understanding of the potential impact of threats and hazards on school buildings and grounds. • Increased understanding of risk and vulnerabilities of school buildings and grounds when developing the plan. • Knowledge of which facilities are physically accessible to students, staff, parents, volunteer workers and emergency response personnel with disabilities and can be used in compliance with the law.
<p>Culture and Climate Assessment</p>	<ul style="list-style-type: none"> • In schools with positive climates, students are more likely to feel connected to adults and their peers. This fosters a nurturing environment where students are more likely to succeed, feel safe and report threats. • A school culture and climate assessment evaluates student and staff connectedness to the school and problem behaviors. For example, this assessment may reveal a high number of bullying incidents, indicating a need to implement an anti-bullying program. • If a student survey is used to assess culture and climate, student privacy must be protected. • A range of school personnel can assist in the assessment of culture and school climate, including school counselors and mental health staff. 	<ul style="list-style-type: none"> • Knowledge of students' and staff's perceptions of their safety. • Knowledge of problem behaviors that need to be addressed to improve school climate.





Type Of Assessment	Description	Purpose + Results
<p>School Threat Assessment</p>	<p>A school threat assessment analyzes communication and behaviors to determine whether or not a student, staff, or other person may pose a threat. These assessments must be based on fact, must comply with applicable privacy, civil rights and other applicable laws, and are often conducted by multidisciplinary threat assessment teams.</p> <p>While a planning team may include the creation of a threat assessment team in its plan, the assessment team is a separate entity from the planning team and meets on its own regular schedule.</p>	<ul style="list-style-type: none"> Students, staff or other persons that may pose a threat are identified before a threat develops into an incident and are referred for services, if appropriate.
<p>Capacity Assessment</p>	<p>The planning team needs to know what resources are at their disposal. A capacity assessment examines the capabilities of students and staff as well as the services and material resources of community partners. This assessment is used to identify people in the building with applicable skills – first-aid certification, search and rescue training, counseling and mental health expertise, ability to assist individuals with disabilities and others with access and functional needs.</p> <p>Equipment and supplies are also inventoried. The inventory should include an evaluation of equipment and supplies <i>uniquely</i> for individuals with disabilities, such as evacuation chairs, the availability of sign language interpreters and technology used for effective communication, accessible transportation, consumable medical supplies and durable medical equipment that may be necessary during a shelter-in-place or evacuation.</p>	<ul style="list-style-type: none"> An increased understanding of the resources available. Information about staff capabilities helps planners assign roles and responsibilities in the plan.

After conducting these assessments, the planning team **consolidates** all of the information it has obtained into a format that is usable for **comparing** the **risks** posed by the identified threats and hazards. This information is then used to **assess** and **compare** threats and hazards and their likely **consequences**. This is referred to as a **risk and vulnerability assessment**.





One effective method for organizing information is to create a table with a range of information about each possible threat and hazard, including any *new* threats or hazards identified through the assessment process. The table should include:

Table 4: RISK + VULNERABILITY ASSESSMENT

- **Probability** or **frequency** of occurrence – for example, how often a threat or hazard may occur.
- **Magnitude** – for example, the extent of expected damage.
- **Time** available to warn staff, students and visitors.
- **Duration** – for example, for how long the hazard or threat will be occurring.
- **Follow-on** and **cascading effects** of threat or hazard.

While some of the information collected **directly** feeds into this table, other information – for example, details on school climate challenges – have to be organized differently. The most important outcome is that information is **clearly presented** so that it can be **easily** used to **inform** the plan’s development.

☐ Prioritize Threats + Hazards

Next, the planning team uses the information it has organized to **compare** and *prioritize risks* posed by threats and hazards. This allows the team to decide which threats or hazards it will **directly address** in the plan.

The team must consider **multiple factors** when developing an **indicator of risk** to the institution. One option is a **mathematical approach**, which assigns index numbers – a 1-to-4, 1-to-5 or 1-to-10 scale – for **different categories** of information used in the ranking scheme. Using this approach, the planning team will categorize threats and hazards as posing a relatively **high, medium** or **low** risk. The following table provides a sample risk assessment **worksheet** for comparing and prioritizing threats and hazards.

Table 5: SAMPLE RISK ASSESSMENT WORKSHEET

Hazard	Probability	Magnitude	Warning	Duration	Risk Priority
Fire	4. Highly likely 3. Likely 2. Possible 1. Unlikely	4. Catastrophic 3. Critical 2. Limited 1. Negligible	4. Minimal 3. 6-12 hrs. 2. 12-24 hrs. 1. 24+ hrs.	4. 12+ hrs. 3. 6-12 hrs. 2. 3-6 hrs. 1. <3 hrs.	☐ High ☐ Medium ☐ Low
HAZMAT spill outside the school	4. Highly likely 3. Likely 2. Possible 1. Unlikely	4. Catastrophic 3. Critical 2. Limited 1. Negligible	4. Minimal 3. 6-12 hrs. 2. 12-24 hrs. 1. 24+ hrs.	4. 12+ hrs. 3. 6-12 hrs. 2. 3-6 hrs. 1. <3 hrs.	☐ High ☐ Medium ☐ Low

Know Your School Population

It is important to have **school census data** by age groups and/or grade levels, as well as **locations** of each when assessing risk. **General populations** are identified as well as those with **functional needs**. Teacher, administrative staff, office support, custodians and cafeteria workers among others are identified and located. A **master schedule** of where classes, grade levels and staffers are located during the day is provided to each classroom and is available in administrative and other non-classroom offices.





Plan development teams should be committed to the **safe evacuation** and **transport of students** and staff with functional needs. Enrollment numbers for those with functional needs will **fluctuate**. Students and/or staff may require **additional assistance** if they are *temporarily* on crutches or wearing a cast, for example.

Plan development includes **identifying** and **maintaining** a list of **staff members trained** and **assigned** to assist those with functional needs during drills, exercises and incidents. That list is included in the plan document.

Step 2: Outcome

After completing **Step 2**, the planning team has a prioritized (**high, medium** or **low** risk) list of **threats** and **hazards** based on the results of the risk assessment.







Step 3: Determine Goals + Objectives

Discussion

In **Step 3**, the planning team decides which of the threats and hazards identified in Step 2 are addressed in the school EOP. The planning team may decide to address *only* those threats and hazards that rank **high** in **risk priority**. Or they may decide to also address some of the threats and hazards that rank **medium**. This is a **critical decision** in the planning process that is left up to the planning team. It is recommended that the team address more than just the “high” risk priority threats and hazards.

Once the planning team decides which threats and hazards are to be addressed in the school EOP, it develops **goals** and **objectives** for *each*.

Action Steps

□ Develop Goals + Objectives

Goals are *broad, general statements* that indicate the **desired outcome** in **response** to the **threat** or **hazard** identified by planners in the previous step. They are what **personnel** and **other resources** are supposed to **achieve**. They also help **identify** when major activities are **complete** and what defines a **successful outcome**.

The goals of recovery are to **return to education** and **restore school infrastructure** as *quickly* as possible.

The planning team develops at least **three (3)** goals for addressing each threat or hazard (though the planning team may want to identify more). Those three goals should indicate the desired outcome for **1) Before, 2) During** and **3) After** the threat or hazard. For a fire, for instance, **three (3) possible goals** include:



- **Hazard Goal Example 1 (Before):** **Prevent** a fire from occurring on school grounds.
- **Hazard Goal Example 2 (During):** **Protect** all persons from injury and property from damage by the fire.
- **Hazard Goal Example 3 (After):** **Provide** necessary medical attention to those in need.

Objectives are *specific, measurable actions* that are **necessary to achieve goals**. Often, planners identify **multiple objectives** in support of a **single goal**.





Using the goal in **Example 1** above (**preventing a fire** on or near school grounds), possible objectives may include:

- **Objective 1.1**
Provide fire prevention **training** to all students and staff who use **combustible** materials or equipment.
- **Objective 1.2**
Store combustible materials in fireproof containers or rooms.

Using the goal in **Example 2** (protecting all persons from **injury** by the fire), possible objectives may include:

- **Objective 2.1**
Evacuate all persons from the building immediately.
- **Objective 2.2**
Account for all persons.

Using the goal in **Example 3** (providing **necessary medical attention** to those in need, possible objectives may include:

- **Objective 3.1**
Immediately **notify fire** department officials and **EMS** personnel of any fire on schools grounds by calling 9-1-1.
- **Objective 3.2**
Immediately begin to provide **first aid**.

After the team finishes identifying and articulating objectives for *prioritized* threats and hazards, it likely finds that certain critical **functions** or **activities** apply to *more* than a single threat or hazard. Examples of these **cross-cutting functions** include evacuating, providing medical care and accounting for all students, staff and guests.

After identifying these functions, the planning team develops **three (3) goals** for *each* function. As with the goals already identified for threats and hazards, the **three (3) goals** indicate the desired outcome for **1) Before**, **2) During** and **3) After** the function has been executed.





These **commonly occurring functions** are contained in a *Functional Annex* within the school EOP. More details on these functions are included in the *Plan Content* section of this Guide, including issues to consider as you develop goals and objectives for these functions.

For an evacuation function, **three (3)** possible goals are:

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> • Function Goal Example 1
<i>(Before):</i> Ensure all students and staff know their evacuation route. | <ul style="list-style-type: none"> • Function Goal Example 2
<i>(During):</i> Evacuate the school immediately. | <ul style="list-style-type: none"> • Function Goal Example 3
<i>(After):</i> Confirm all individuals have left the building. |
|--|---|--|

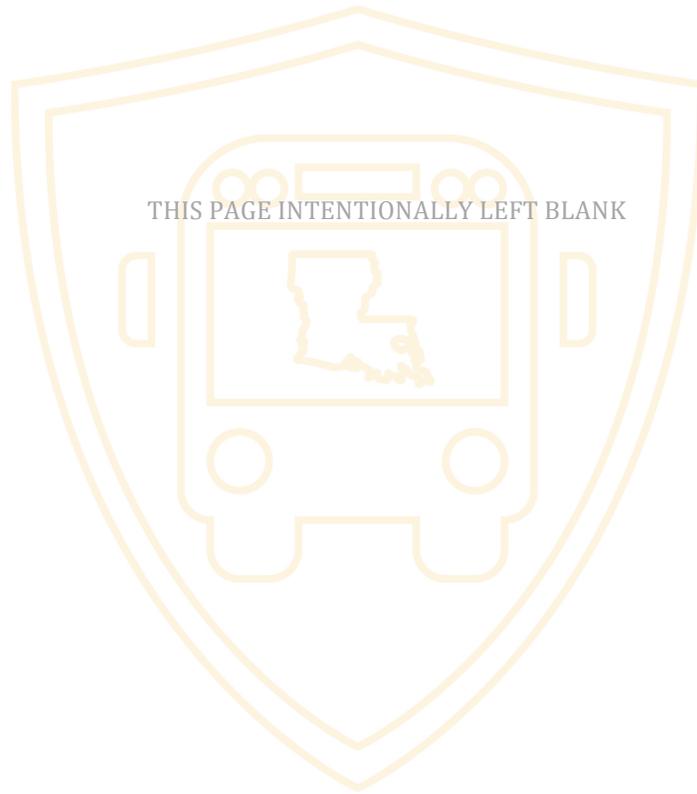
Once the goals for a function are identified, possible **supporting objectives** are identified. For the evacuation goals above, objectives may include:

- **Objective 1.1**
(Before): **Assess, identify** and **communicate** the location of **rally points** to be used during an evacuation.
- **Objective 2.1**
(During): **Evacuate** all students, staff and guests from the school using **assigned routes**.
- **Objective 3.1**
(After): Safely **sweep** the building.

Step 3: Outcome

After completing Step 3, the planning team has at least **three (3)** goals (*Before, During and After*) for *each threat or hazard* and function, as well as **objectives** for each goal.







Step 4: Plan Development (Identifying Courses Of Action)

Discussion

In **Step 4**, the planning team develops courses of action for accomplishing each of the objectives identified in Step 3 – or threats, hazards and functions. Courses of action address the **what, who, when, where, why** and **how** for *each* threat, hazard and function. The planning team examines *each course of action* to determine whether it is **feasible** and whether stakeholders necessary to implement it find it **acceptable**.

For additional issues to consider as you develop courses of action for functions, please see the *Plan Content* section of this Guide.

Action Steps

□ Identify Courses Of Action

Courses of action include **criteria** for determining **how** and **when** each response will be implemented under a variety of **circumstances**. Subsequently, the planning team develops response **protocols** and **procedures** to support these efforts. Possible courses of action are typically developed using the following steps:

1. **Depict the scenario.** Create a potential scenario based on the threats and hazards identified and prioritized in Step 2.
2. **Determine the amount of time available** to respond. This will vary based on the type of threat or hazard and the particular scenario. For example, in the case of a **hurricane**, the school might have **days** or **hours to respond** before the storm makes landfall, while the school may have to **respond in minutes** to an active shooter.
3. **Identify decision points.** Decision points indicate the place in time, as threats or hazards unfold, when leaders anticipate making **decisions** about a course of action. Walking through each scenario in detail helps identify the **relevant decision points** for each, such as whether or not to evacuate, shelter-in-place or lockdown.
4. **Develop courses of action.** Planners develop courses of action to **achieve** their **goals** and **objectives** by answering the following questions:
 - What is the **action**?
 - Who is **responsible** for the action?
 - **When** does the action take place?
 - How **long** does the action take and how much **time** is actually available?
 - What has to happen **before**?
 - What happens **after**?
 - What **resources** are needed to **perform** the action?





- How will this action **affect** specific populations, such as individuals with **disabilities** and others with **access** and **functional needs** who may require **medication**, **wayfinding**, evacuation **assistance** or personal assistance services, or who may experience severe **anxiety** during traumatic events?

Plans Must Comply With The Americans With Disabilities Act

Plans **must comply** with the *Americans with Disabilities Act* (ADA), among other **prohibitions** on **disability discrimination**, across the **spectrum** of emergency management **services, programs, and activities**, including preparation, testing, notification and alerts, evacuation, transportation, sheltering, emergency medical care and services, transitioning back, recovery, and repairing and rebuilding. Plans should include students, staff and parents with **disabilities**. Among other things, school emergency plans *must* address the provision of **appropriate auxiliary aids and services** to ensure **effective communication** with individuals with disabilities (e.g., interpreters, captioning and accessible information technology); ensure individuals with disabilities are **not separated** from **service animals** and **assistive devices** and can receive disability-related **assistance** throughout emergencies (e.g., assistance with activities of daily living, administration of medications); and comply with the law's **architectural** and other **requirements**. Information and technical assistance about the ADA is available at <http://www.ada.gov>.

Plans Must Address Language Access

Effective communication with individuals with **limited English proficiency** (LEP), including students and parents, is an **essential** component of emergency planning and response. Plans must comply with applicable **legal requirements** on language access, including *Title VI of the Civil Rights Act of 1964*, available at <http://www.justice.gov/crt/about/cor/coord/titlevi.php>, and the *Title VI* regulation of the *Civil Rights Act of 1964*, available at <http://www.justice.gov/crt/about/cor/fedagencies.php>.

□ Select Courses Of Action

After developing **courses of action**, planners **compare** the **costs** and **benefits** of each **proposed** course of action against goals and objectives. Based on this **comparison**, planners select the **preferred** course or courses of action to move forward in the planning process. Plans often include **multiple** courses of action for a **given scenario** to reflect the **different** ways it could unfold.

After selecting courses of action, the planning team **identifies resources** necessary to accomplish *each* course of action *without* regard to **resource availability**. Once the planning team identifies all of the requirements, it begins **matching** available **resources** to **requirements**. This step provides planners an opportunity to identify and address **resource gaps** or **shortfalls**.





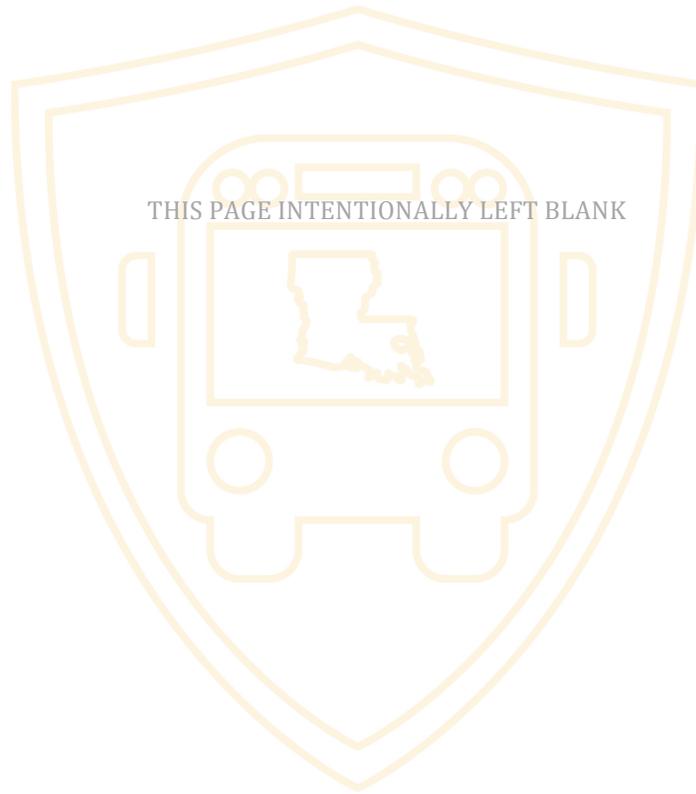
Step 4: Outcome

After completing Step 4, the planning team has **identified goals, objectives** and **courses of action** for *before, during* and *after* threats and hazards, as well as functions.

Goals, objectives and **courses of action** for *threats and hazards* go into the *Threat- and Hazard-Specific Annexes* section of the school EOP.

Goals, objectives and **courses of action** for *functions* are contained in the *Functional Annexes* section of the school EOP.







Step 5: Plan Preparation + Review + Approval

Discussion

In **Step 5**, the planning team develops a **DRAFT** of the school EOP using the courses of action developed in **Step 4**. In addition, the team **reviews** the plan, obtains **official approval** and **shares** the plan with **community partners** such as **first responders**, **local emergency management officials**, **staff** and **stakeholders**.

Action Steps

□ Format The Plan

An effective school EOP is presented in a way that makes it easy for users to find the information they need and that is **compatible** with local and State plans. This may include using **plain language** and providing **pictures** and/or **visual cues** for key action steps. This Guide presents a traditional format that can be tailored to meet individual school needs. This format has **three (3) major sections**: the *Basic Plan*, *Functional Annexes* and *Threat- and Hazard-Specific Annexes*.

The *Basic Plan* section of the school EOP provides an **overview** of the school's **approach** to emergency operations. Although the *Basic Plan* section **guides** the development of the more **operationally oriented** annexes, its primary audiences consist of the **school**, local **emergency officials** and the **community** (as appropriate). The elements listed in this section should meet the needs of these audiences while providing a **solid foundation** for the **development** of supporting annexes.



The *Functional Annexes* section details the **goals**, **objectives** and **courses of action** of functions – such as evacuation, communications and recovery – that apply across **multiple** threats or hazards. Functional annexes set forth **how** the school **manages** a function *before*, *during* and *after* an emergency.

The *Threat- and Hazard-Specific Annexes* section specifies the **goals**, **objectives** and **courses of action** that a school will follow to address a **particular type** of threat or hazard (e.g., hurricane, active shooter). Threat- and hazard-specific annexes, like functional annexes, set forth **how** the school **manages** a function *before*, *during* and *after* an emergency.

The following functional format can be used for the *Functional Annexes* as well as for the *Threat- and Hazard-Specific Annexes* sections. Using the format below and the work the planning team did in Step 4, each **function**, **threat** and **hazard** has at *least* **three (3)** goals, with **one (1)** or *more* objectives for *each* **goal** and a **course of action** for *each* of the **objectives**.





- **Title** (the function, threat or hazard)
- **Goal(s)**
- **Objective(s)**
- **Courses of Action** (Describe the courses of action you developed in Step 4 in the sequence in which they will occur.)

Table 6 below outlines the different components of each of these three sections.⁵

Table 6: TRADITIONAL EOP FORMAT

<p>Basic Plan</p> <p>1. Introductory Material</p> <ul style="list-style-type: none"> a. Promulgation Documentation and Signatures b. Approval and Implementation c. Record of Changes d. Record of Distribution e. Table of Contents (TOC) f. Site Maps, Floor Plans, etc. g. School Census Data <p>2. Purpose, Scope, Situation Overview and Assumptions</p> <ul style="list-style-type: none"> a. Purpose b. Scope c. Situation Overview d. Planning Assumptions 		<p>3. Concept of Operations</p> <p>4. Organization and Assignment of Responsibilities</p> <p>5. Direction, Control and Coordination</p> <p>6. Information Collection, Analysis and Dissemination</p> <p>7. Training and Exercises</p> <p>8. Administration, Finance and Logistics</p> <p>9. Plan Development and Maintenance</p> <p>10. Authorities and References</p>
<p>Functional Annexes</p> <p>NOTE: This is not a complete list, but it is recommended that <i>all</i> EOPs include at least the following <i>Functional Annexes</i>:</p> <ul style="list-style-type: none"> • Communications • Evacuation • Shelter-in-Place • Lockdown • Accounting for All Persons • Reunification • Continuity of Operations (COOP) • Security • Recovery • Health and Medical 		
<p>Threat- Or Hazard-Specific Annexes</p> <p>NOTE: This is not a complete list. Each school's annexes will vary based on its hazard analysis.</p> <ul style="list-style-type: none"> • Hurricane or Severe Storm • Earthquake • Tornado • Hazardous Materials Incident • Mass Casualty Incident • Active Shooter • Pandemic or Disease Outbreak 		

⁵The term *annex* is used throughout this Guide to refer to functional, hazard- or threat-specific, or other supplements to the Basic Plan. Some plans may use the term *appendix* in the same fashion (e.g., hazard-specific appendix).



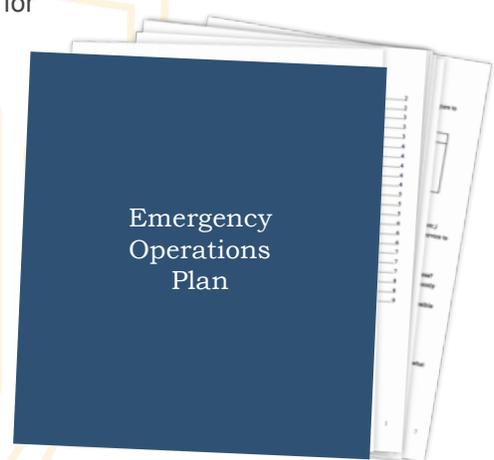


□ Write The Plan

As the planning team works through the DRAFT, the members add necessary **tables, charts** and other supporting **graphics**. The planning team **circulates** a DRAFT to obtain **comments** from **stakeholders** that have **responsibilities** for **implementing** the plan.

Successful plans are written according to the following simple rules.

- **Summarize** important information with **checklists** and **visual aids**, such as maps and flowcharts.
- Write **clearly**, using **plain language**, avoiding jargon and *minimizing* the use of abbreviations. Use short sentences and **active voice**. Qualifiers and vague wording only add to confusion.
- Use a **logical, consistent structure** that makes it easy for readers to grasp the **rationale** for the sequence of the information and to scan for the information they need.
- Provide enough detail to convey an **easily understood** plan that is **actionable**. For example, classroom teachers may have a **one- (1-) page document** that covers what they need to **know** and **do** during an emergency, or create flip-charts, posters or signs giving simple directions. Organize the contents in a way that helps users *quickly identify solutions* and **options**. Plans should provide **guidance** for carrying out common **courses of action**, through the functional and threat- and hazard-specific annexes, while also staying out of the weeds.
- Develop **accessible tools** and **documents**. Use appropriate **auxiliary aids** and **services** necessary for effective communication, such as **accessible websites**, **digital text** that can be converted to audio or Braille, **text equivalents** for images and captioning of any audio and **audio description** of any video content.



□ Review The Plan

Planners should check the written plan for **compliance** with applicable laws and for its **usefulness** in practice. Commonly used **criteria** help determine the **effectiveness** and **efficiency** of the plan. The following measures help determine if a plan is of **high quality**:

- A plan is **adequate** if the plan identifies and addresses **critical courses of action** effectively; the plan can accomplish the **assigned function**; and the plan's **assumptions** are **valid** and **reasonable**.
- A plan is **feasible** if the school can accomplish the **assigned function** and **critical tasks** by using available **resources** within the **time** contemplated by the plan.
- A plan is **acceptable** if it meets the requirements driven by a threat or hazard, meets **cost** and **time limitations** and is **consistent** with the **law**.





- A plan is **complete** if it:
 - a. **Incorporates all courses of action** to be accomplished for *all* selected threats and hazards and identified functions.
 - b. **Integrates** the needs of the **whole school community**.
 - c. Provides a complete **picture** of what should happen, when and at whose direction.
 - d. **Estimates time** for achieving objectives, with **safety** remaining as the utmost priority.
 - e. Identifies **success criteria** and a **desired end state**.
 - f. Conforms with planning principles outlined in this Guide.

The plan must **comply** with applicable local and State requirements because these provide a baseline that facilitates both planning and execution.

Additionally, when reviewing the plan, the planning team does not have to provide all of the **resources** needed to **execute** a course of action or meet a requirement established during the planning effort. However, the plan must explain **where** or **how** the district and school will obtain the resources to support those requirements.



HAYNESVILLE HIGH SCHOOL

□ Approve + Share The Plan

After finalizing the plan, the planning team **presents** the plan to **appropriate leadership** and obtains **official approval** of the plan. The team then shares the plan with its **community partners** who have a responsibility in the plan (e.g., first responders, local emergency management staff, etc.) and additional **stakeholders** that have a role in the plan, including relevant local, district, regional and/or State **agencies** with which the plan is page coordinated. The plan is also shared with other **organizations** that may use the school building(s).

Schools should be careful to **protect** the plan from those who are not **authorized** to have it and should consider how they will **secure documents** shared electronically. Law enforcement agencies and first responders have a secured, Web-accessible site available to **house** copies of **plans, building schematics, phone contact sheets** and other **important details** that round out planning. Schools *must comply* with local and State **open records laws** in storing and protecting the plan.

The planning team maintains a **record** of the people and organizations that **receive** a copy of the plan.

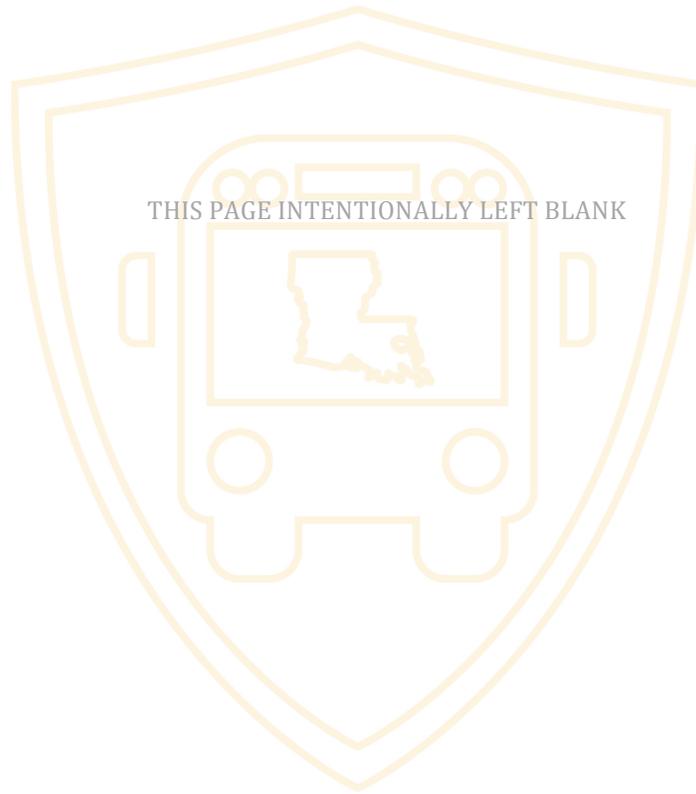




Step 5: Outcome

After completing Step 5, the planning team has a **final school EOP**.







Step 6: Plan Implementation + Maintenance

Action Steps

□ Train Stakeholders On The Plan + Their Roles

Everyone involved in the plan needs to know her or his **roles** and **responsibilities** *before, during* and *after* an emergency. **Key training** includes:

- **Hold a meeting.** At least **once a year**, hold a meeting to **educate** all parties on the plan. Go through the plan to **familiarize** these **stakeholders** with it.
- **Visit evacuation sites.** Show involved parties not only where **evacuation sites** are located but also where **specific areas**, such as **reunification** areas, **media** areas and **triage** areas will be located.
- **Give involved parties appropriate and relevant literature on the plan, policies and procedures.** It may also be helpful to provide all parties with **quick reference guides** that remind them of key courses of action.

□ Post Key Information Throughout The Building

It is important that students and staff are **familiar** with and have **easy access** to information such as evacuation **routes** and shelter-in-place **procedures** and **locations**. Ensure that information concerning evacuation routes and shelter-in-place procedures and locations is effectively **communicated** to students, staff, and parents with disabilities as well as others with access and functional needs, such as **distributing** materials by **email** in an accessible format.

□ Familiarize Students + Staff + Community Partners With The Plan

Bringing **community partners** (e.g., law enforcement officers, fire officials, emergency management and EMS personnel) that have a **role** in plan implementation into the school to talk about the plan makes students and staff more **comfortable** working with these partners.

□ Train Staff On The Skills Necessary To Fulfill Their Roles

Staff is assigned **specific roles** in the plan and positions **supporting** the Incident Command System (ICS) that require **special skills**, such as **first aid**, **threat assessment** and provision of **personal assistance services** for students with disabilities and others with access and functional needs. Also, **substitute teachers** must be trained on the plan and their roles in the plan.





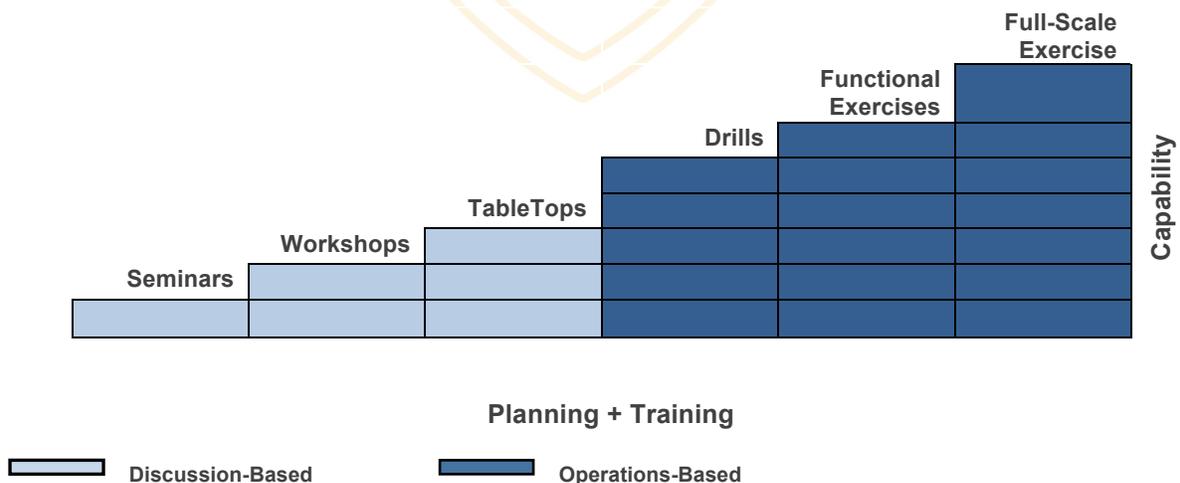
□ Exercise The Plan

The more a plan is **practiced** and stakeholders are **trained** on the plan, the more effectively they are able to act *before, during* and *after* an emergency to **lessen the impact** on life and property.

Exercises provide opportunities to **practice** with **community partners** (e.g., first responders, local emergency management personnel and others), as well as identify gaps and weaknesses in the plan. The exercises below require increasing amounts of **planning, time** and **resources**. Ideally, schools create an **exercise program**, building from a TableTop exercise up to a more advanced exercise, like a functional exercise.

- **TableTop exercises.** TableTop exercises are **small-group** discussions that **walk through** a scenario and the courses of action a school will need to take *before, during* and *after* an emergency to **lessen the impact** on the school community. This activity helps **assess the plan** and **resources**, and **facilitates** an understanding of emergency management and planning concepts.
- **Drills.** During drills, school personnel and community partners (e.g., first responders, local emergency management staff and others) use the **actual school grounds** and buildings to **practice** responding to a scenario.
- **Functional exercises.** Functional exercises are similar to drills but involve **multiple partners**; some may be conducted district-wide. Participants react to **realistic simulated** events (e.g., a bomb threat, or an intruder with a gun in a classroom), and **implement** the plan and **procedures** using the ICS.
- **Full-scale exercises.** These exercises are the *most time-consuming* activity in the exercise continuum and are **multi-agency, multi-jurisdictional** efforts in which all **resources** are deployed. This type of exercise **tests collaboration** among agencies and participants, public information systems, communications systems and equipment. An **Emergency Operations Center (EOC)** is established by either law enforcement or fire services, and the ICS is activated.

Figure 4: BUILDING BLOCK APPROACH





Before making a decision about how many and which types of exercises to implement, a school should consider the **costs** and **benefits** of each, as well as any local or State requirements. For example, while a TableTop exercise may be *less* costly and less time-consuming to run, a full-scale exercise provides a *more realistic context* for the simulated response to an emergency situation, thus providing more **constructive feedback** to improve the plan.

If students are involved, the school also considers **age** of the **student population** when selecting the appropriate exercise. Schools should also consider whether to include **parents** and should take into account the **cultural diversity** of their populations when designing exercises and training.

It is up to the planning team to decide **how often** exercises should be conducted. While frequent exercise is important, it is imperative that exercises are of **high quality**. To effectively execute an exercise:

- Include **community partners** such as first responders (law enforcement officers, EMS practitioners and fire department personnel) and local **emergency management staff**.
- **Communicate** information in **advance** to avoid confusion and concern.
- Exercise under **different** and **non-ideal** conditions (e.g., times of day, weather conditions, points in the academic calendar, absence of key personnel and various school events).
- Be **consistent** with common emergency management **terminology**.
- **Debrief** and develop an **After Action Report (AAR)** that **evaluates** results, identifies **gaps** or **shortfalls** and **documents** lessons learned.
- Discuss how the school EOP and **procedures** will be **modified**, if needed, and specify who has **responsibility** for modifying the plan.

For additional information on conducting exercises, please see the *Homeland Security Exercise and Evaluation Program Guide* at https://hseep.dhs.gov/pages/1001_HSEEP10.aspx and the exercise-planning tool in the *Louisiana ToolKit for Developing High-Quality School Emergency Operations Plans* (High-Quality EOP Toolkit).

□ Review + Revise + Maintain The Plan

This step closes the loop in the planning process. It focuses on adding the **information gained** from exercising the plan to the **research** collected in Step 2, starting the planning cycle over again. Remember, planning is a **continuous process** even after the plan is published. Plans should **evolve** as the school and planning team **learn lessons**, obtain **new information** and **insights** and update **priorities**.

Reviews are a *recurring* activity. Planning teams should establish a **process** for **reviewing** and **revising** the plan. Many schools review their plans on an **annual basis**. In *no* case should any part of a plan go for *more than* **two (2) years** without being reviewed and revised.

Some schools have found it useful to **review** and **revise portions** of the plan instead of reviewing the entire plan at once. Schools may consider reviewing a portion **each month** or at **natural breaks** in the academic **calendar**.

Figure 5: PREPAREDNESS CYCLE



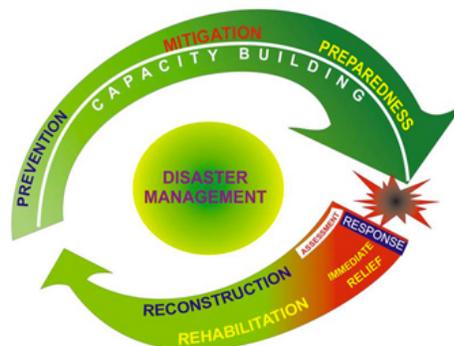


Certain events provide *new* information that is then used to inform the plan. Schools should consider reviewing and updating their plans or sections of their plans after:

- ✓ **Actual emergencies.**
- ✓ **Changes** have been made in **policy, personnel, organizational structures, processes, facilities or equipment.**
- ✓ Formal **updates** of planning **guidance or standards** have been finalized.
- ✓ **Formal exercises** have taken place.
- ✓ **Changes** in the **school** and surrounding **community** have occurred.
- ✓ **Threats or hazards** change or new ones **emerge.**
- ✓ Ongoing **assessments** generate new **information.**

The planning team should ensure that all **community partners** (e.g., first responders, local emergency management staff) have the most **current version** of the school EOP.

Figure 6: DISASTER MANAGEMENT CYCLE/CAPACITY BUILDING





Basic Plan

Step 5 of the planning process in this Guide introduced a format with **three (3) sections** for schools to follow in developing a school EOP. This section provides **greater detail** about what *each* of the **three (3) sections** should include and some **key considerations** in developing content.

The **Basic Plan** section of the school EOP provides an **overview** of the school's **approach** to **operations** *before, during* and *after* an emergency. This section addresses the **overarching activities** the school undertakes regardless of the **function, threat** or **hazard**. The content in this section provides a **solid foundation** for the school's operations.

THESE ARE THE DAYS WHEN WE NEED A PLAN

The information in this section should not duplicate information contained in other parts of the plan. Almost all of the information contained in the basic plan should be able to come from the planning team. If the planning team finds that it has to go **outside** its members for a significant amount of information, it may be an indication that the planning team membership needs to be expanded.

Concerning specific information recommended for inclusion in a school EOP, it is important to create and insert appropriate **floor plans** for each building and provide **critical** emergency information. These must be kept **current**. It is also important to identify appropriate **staff** to fill **specific roles** related to **command operations**, **cross-train** staff and keep this information in a **secure** and **safe** location.

Introductory Material

Introductory material enhances **accountability** with community partners – including first responders, local emergency managers and public and mental health officials – and makes a school EOP easier to use. Typical introductory material includes:

- ❑ **Cover Page.** The cover page includes the **title** of the plan, a **date**, and the **school(s)** covered by the plan.
- ❑ **Promulgation Documenter Signature Page.** This document or page contains a signed statement formally **recognizing** and **adopting** the school EOP. It gives both the authority and the responsibility to school officials to perform their tasks *before, during* or *after* an incident, and therefore should be **signed** by the **school administrator** or another authorizing official.
- ❑ **Approval and Implementation Page.** The approval and implementation page introduces the plan, outlines its applicability and indicates that it *supersedes* all **previous plans**. It includes a **delegation of authority** for specific modifications that can be made to the plan and by whom they can be made without the school administrator's signature. It also includes a **date** and should be signed by the **authorized** school administrator.



TRAINING OPPORTUNITIES





- ❑ **Record of Changes.** Each **update** or **change** to the plan is **tracked**. The record of changes, usually in table format, contains, at a minimum, a **change number**, the **date** of the change, the **name** of the person who made the change, and a **summary** of the change.
- ❑ **Record of Distribution.** The record of distribution, usually in table format, indicates the **title** and the **name** of the person receiving the plan, the **agency** to which the recipient belongs (either the school office or, if from outside the school, the name of the appropriate government agency or private-sector entity), the **date of delivery**, and the **number of copies** delivered. Other relevant information could be considered. The record of distribution can be used to prove that individuals and organizations with specified roles have **acknowledged their receipt, review and/or acceptance** of the plan. **Copies** of the plan can be made available to the **public** and media **without sensitive** information, in accordance with **public records laws**.
- ❑ **Table of Contents (TOC).** The TOC is a **logically ordered**, clearly identified **layout** of the **major sections** and **subsections** of the plan. The TOC makes finding information within the plan **easier**.
- ❑ **Campus and Building Information.** Your plan needs to include where you are located with a description of the **number of buildings** on campus, where athletic fields, parking lots and other facilities are located and where **classes** are located. A **campus map** or a **site plan** and **building floor plans** help **first responders move rapidly** through the school when there is an emergency event. Maps, building schematics and/or floor plans need to be annotated with **evacuation routes, shelter locations, fire alarm pull stations, fire hydrants, fire extinguishers, first-aid kits, hazardous materials storage** and **utility shut off valves**. **Photos** of the outside and inside of building(s) and the campus are also helpful.

Classrooms containing students and staff that require *additional* assistance during an incident are noted (with an asterisk) next to the room number during the applicable class period(s) on the **Master Schedule**. A list of students and staff names with functional needs along with their schedules is located at the administrative offices.

- ❑ **School Populations.** As noted earlier in this Guide, knowing who's on campus and where is vital when an emergency or disaster occurs. Your EOP includes **current enrollment, support staff** and **faculty**. **Your plan should identify the number of:**
 - **Teachers and specialists**
 - **Administrators**
 - **Office and support staff**
 - **Instructional assistants**
 - **Cafeteria staff**
 - **Maintenance and custodial staff**
 - Any **others** that are a part of your school community





Additionally, the plan identifies the **number** of students and faculty that have:

- **Limited English proficiency (LEP)**
- **Blindness or visual disabilities**
- **Cognitive or emotional disabilities**
- **Deafness or hearing loss**
- **Mobility/physical disabilities** (permanent and temporary)
- **Medically fragile health** (including asthmas and severe allergies)

The plan notes that a **Master Schedule** of where classes, grade levels and staff are located during the day is provided to each classroom and where it can be found outside of the classroom (likely through the **administrative offices**).

The planning process must include preparing and making available to first responders an **up-to-date** and **well-documented site assessment** as well as any other information that can assist them. These materials include a **map, building schematics** and **photos** of both the inside and the outside, and include information about **door** and **window** locations, and **locks** and **access controls**. Emergency responders should also have *advance* information on where students, staff, and others with disabilities as well as those with access and functional needs are likely to be sheltering or escaping, generally in physically accessible locations, along accessible routes, or in specific classrooms. Building strong partnerships with law enforcement officers, fire officials and EMS technician includes ensuring they also know the location of available **public address systems, two-way communications systems, security cameras** and **alarm controls**. Equally important is information on access to **utility controls, medical supplies** and **fire extinguishers**.

Providing the detailed information listed above to first responders allows them to *rapidly move* through a school during an emergency, to **ensure** areas are **safe** and to tend people in **need**. It is *critically* important to share this information with law enforcement and other first responders *before* an emergency occurs. This is especially true in an active shooter situation discussed on page 77. Law enforcement agencies have secure websites where this information is stored for many schools, businesses, public venues and other locations. All of these can be provided to first responders and viewed in drills, exercises and walk-throughs.

Purpose + Situation Overview

The *Purpose and Situation Overview* section includes the following components:

- ❑ **Purpose.** The purpose sets the **foundation** for the rest of the school EOP. The basic plan’s purpose is a **general statement** of what the school EOP is meant to do. The statement should be supported by a **brief synopsis** of the basic plan and annexes.
- ❑ **Situation Overview.** The situation section explains **why** a school EOP is **necessary**. The situation section covers a general discussion of:
 - **Threats and hazards** that pose a **risk** to the school and would result in a need to use this plan; and
 - **Dependencies** on parties outside the school for **critical resources**.





Concept Of Operations (CONOPs)

The Concept of Operations (CONOPS) section explains in *broad terms* the school administrator’s **intent** with regard to an operation.

This section is designed to give an **overall picture** of how the school will **protect** the students, staff and visitors and:

- Identifies those with **authority to activate** the plan (e.g., school administrators, department heads).
- Describes the **process** by which the school **coordinates** with all appropriate agencies, boards or divisions within the jurisdiction.
- Describes how plans take into account the **architectural, programmatic and communication** rights of individuals with **disabilities** and others with **access and functional needs**.
- Identifies other **response and support agency plans** that **directly support** the implementation of this plan (e.g., city or Parish EOP, school EOPs from schools co-located on the campus).
- Explains that the **primary purpose** of actions taken *before* an emergency is to **prevent, protect** from and **mitigate** the **impact** on life or property.
- Explains that the **primary purpose** of actions taken *during* an emergency is to **respond** to the emergency and **minimize** its **impact** on life or property.
- Explains that the **primary purpose** of actions taken *after* an emergency is to **recover** from its **impact** on life or property.

Concept of Operations
[COOP_XX_US_PRO_0000]

Assumptions

Assumptions are unknown but **assumed conditions** to be true that allow you to move *forward* with your planning efforts. For example, activation of the plan requires the involvement of multiple agencies and you *assume* you have their **full support**.

The EOP **identifies** and **articulates** the assumptions underlying the plan.

Organization + Assignment Of Responsibilities

This section provides an overview of the *broad roles* and **responsibilities** of school staff, families, guardians and community partners (e.g., first responders, local emergency managers, public and mental health personnel), and of **organizational functions** *during* all emergencies. Remember that **key staff assignments and contact information** must be regularly **updated** to ensure **efficient** operations in the event of an emergency. Finally, once you have **developed** your school EOP – High-Quality EOP – appropriate **workshops** and/or **seminars** should be conducted to ensure that *all* district and school personnel **understand** the plan and their **roles** and **responsibilities**. This section:





□ Describes the broad roles and responsibilities of individuals that apply *during*⁶ all emergencies.

- Individuals that the planning team may wish to include in this section of the plan are **principals** and other school **administrative leaders, teachers, support personnel** (e.g., instructional aides, counselors, social workers, psychologists, nurses, maintenance staff, school resource officers [SROs], cafeteria workers, bus drivers) and **parents and guardians**.
- The planning team may also wish to include **community-based** organizations represented in the EOP.
- The following is an example of the type of information to include in the plan to describe the *broad roles and responsibilities* of teachers during all emergencies.



TRAINING MEETING

Teachers are responsible for the **supervision** of students, **remaining** with students until directed otherwise. Teachers' responsibilities include:

- Directing students to inside or outside **assembly areas** according to instructions provided by the incident commander or designee.
- **Accounting** for students when class **relocates** to an outside or inside assembly area or **evacuates** to another location.
- **Reporting missing students** to the incident commander or designee.
- Obtaining **first-aid services** for injured students – and if trained and certified in first aid – rendering first aid if necessary.

□ Describes **informal** and **formal** agreements – including **memorandums of understanding** (MOUs) – in place for the **quick activation** and **sharing** of resources during an emergency (e.g., evacuation locations to a nearby business' parking lot). **Agreements** may be between the school and response groups (e.g., fire department, police department), neighboring schools, organizations and businesses.

⁶If the planning team considers the information critical to the successful implementation of the plan, it may identify roles and responsibilities of one or more of these individuals *before* and *after* an emergency in addition to during an emergency.





Direction + Control + Coordination

This section describes the **framework** for all **direction**, **control** and **coordination** activities. It explains:

- ❑ The ICS **structure** as used by the school.
- ❑ The **relationship** between the **school** EOP and the **district**, or the broader community's **emergency management system**.
- ❑ Who has **control** of **equipment**, **resources** and **supplies** needed to support the school EOP.

Information Collection + Analysis + Dissemination

This section addresses the role of **information** in the successful **implementation** of activities that occur *before*, *during* and *after* an emergency.

- ❑ Identify the **type of information** that is helpful in the successful implementation of activities that occur *before*, *during* and *after* an emergency, such as:

Before and During: **Weather** reports, **law enforcement alerts**, **National Oceanic and Atmospheric Administration (NOAA) radio alerts**, **crime** reports.

After: **Mental health** agency websites and hotlines, **emergency** management and **relief agency** websites and hotlines assisting in all aspects of recovery.

- ❑ For *each* of the identified types of information, provide answers to the following questions:
 - What is the **source** of the information?
 - Who **analyzes** and **uses** the information?
 - How is the information **collected** and **shared**?
 - What is the **format** for **providing** the information to those who will use it?
 - When should the information be **collected** and **shared**?

Figure 7: EXERCISE PROGRAM MANAGEMENT



Training + Exercises

This section describes the **critical training** and **exercise** activities the school uses in support of the plan. This includes the **core** training **objectives** and **frequency** to ensure that staff, students, faculty, parents and community representatives understand **roles**, **responsibilities** and **expectations**. This section also establishes the expected **frequency** of exercises to be conducted by the school.

Content may be influenced based on similar requirements at the local and/or district jurisdiction level(s). Exercises may range from **basic**





fire and shelter-in-place **drills** to **full-scale community-wide** drills that **realistically** portray a crisis and show the role the school plays in school district and municipal planning.

Administration + Finance + Logistics

This section covers *general* support requirements and the **availability** of **services** and **support** for all types of emergencies, as well as general **policies** for **managing** resources. It **identifies** and **references** policies and procedures that exist outside the plan. This section:

- Identifies **administrative controls** (e.g., budget and acquisition policies and procedures) and **requirements** that used to provide resource and expenditure **accountability**.
- Briefly describes how the school will maintain **accurate logs** of **key activities**.
- Briefly describes how **vital records** (e.g., student records) will be **preserved** (details may be contained in a *Continuity of Operations [COOP] Functional Annex*).
- Identifies general policies for keeping **financial records**, **tracking** resource **needs**, tracking the **source** and **use** of resources, **acquiring ownership** of resources and **compensating** the owners of **private property** used by the school.

Plan Development + Maintenance

This section discusses the overall **approach** to planning and the **assignment** of plan development and maintenance responsibilities. This section:

- Describes the **planning process**, **participants** in that process, and how **development** and **revision** of different sections of the school EOP (basic plan and annexes) are **coordinated before** an emergency.
- Assigns responsibility** for the *overall* planning and coordination to a **specific position** or person.
- Provides for a **regular cycle** of training, evaluating, reviewing and updating of the school EOP.

Authorities + References

This section provides the **legal basis** for emergency operations and activities, and includes:

- Lists** of **laws**, **statutes**, **ordinances**, **executive orders (EOs)**, **regulations** and formal **agreements** relevant to emergencies.
- Provisions for the **succession** of **decision-making authority** and **operational control** to ensure that critical emergency **functions** can be performed in the **absence** of the school administrator.







Functional Annexes Content

Functional annexes focus on **critical operational functions** and the **courses of action** developed to carry them out. This section of the Guide describes functional annexes that schools should address in developing a **comprehensive, High-Quality EOP**. As the planning team **assesses** school **needs**, it may need to prepare *additional* or different annexes. Also included in this section are **issues** the planning team should **consider** as it develops **goals, objectives** and courses of action for these functions. These are some of the most important issues; **they are not meant to constitute an exhaustive list.**

MANY FUNCTIONS MAY OCCUR SIMULTANEOUSLY

While these functions are **described separately**, it is important to remember that many functions occur **consecutively**. For example, a shelter-in-place during an emergency may be implemented but, if the building is damaged, the school may then initiate an evacuation.

Often, **multiple functions** will also be performed **concurrently**. For example, during an evacuation, once students are safely out of the building, the accounting for students, staff and guests function begins. The evacuation function, however, is still in effect as staff or first responders work to locate and evacuate any persons not accounted for.

While functions build upon one another and **overlap**, it is not necessary to **repeat** a course of action in a functional annex if it appears in a second functional annex. For example, though an evacuation may lead to reunification, it is not necessary to list a course of action for reunification within the *Evacuation Annex*.

Functional Annexes

- Accounting for All Persons
- Communications and Warnings
- Continuity of Operations (COOP)
- Evacuation
- Family Reunification
- Lockdown
- Public Health, Medical and Mental Health
- Recovery
- Security
- Shelter-in-Place
- Others(s)

□ Evacuation Annex

This annex focuses on the **courses of action** that schools execute to **evacuate** school buildings and grounds.

The planning team considers the following when developing their **goals, objectives** and **courses of action**:

- How to **safely** move students and visitors to **designated assembly areas** from classrooms, outside areas, cafeterias and other school locations.
- How to evacuate when the **primary** evacuation **route** is **unusable**.
- How to evacuate students who are **not with a teacher** or staff member.
- How to evacuate **individuals with disabilities** (along with service animals and assistive devices, e.g., wheelchairs) and others with **access** and **functional needs**, including language, transportation and medical needs.





All emergency operations plans (EOPs) *must* take into account **students** and **staff** with **physical** or **emotional disabilities** or **challenges** and prepare *individual* EOPs to address those needs.

□ Lockdown Annex

This annex focuses on the **courses of action** schools execute to **secure** school **buildings** and **grounds** during incidents that pose an **immediate** threat of **violence** in or around the school. The primary objective of a lockdown is to *quickly* ensure all school staff, students and visitors are **secured** in rooms **away** from **immediate danger**.

The planning team considers the following when developing its **goals, objectives** and **courses of action**:

- How to **lock** all **exterior doors** and when it may or may not be safe to do so.
- How particular **classroom** and **building characteristics** (i.e., windows, doors) impact possible lockdown courses of action.
- What to do when a threat **materializes inside** the school.
- When to use the **different variations** of a lockdown (e.g., when outside activities are curtailed, doors are locked, visitors are closely monitored, but all other school activities continue as normal).

□ Shelter-In-Place Annex

A Shelter-in-Place annex focuses on **courses of action** when students and staff are required to **remain indoors**, perhaps for an **extended** period of **time**, because it is safer inside the building or a room than outside. Depending on the threat or hazard, students and staff may be required to move to rooms that can be **sealed** (such as in the event of a chemical or biological hazard) or **without windows**, or to a **weather shelter** (such as in the event of a tornado).

The planning team considers the following when developing its **goals, objectives** and **courses of action**:

- What **supplies** are needed to **seal the room** and to provide for the needs of students and staff (e.g., water).
- How a shelter-in-place can **affect** individuals with **disabilities** and others with access and **functional needs**, such as students who require the regular administration of **medication**, **durable medical equipment** and personal assistant **services**.
- How to move students when the **primary route** is **unusable**.
- How to locate and move students who are **not with a teacher** or staff member.
- The need for and integration of **safe rooms** for protection against extreme wind hazards (such as a tornado or hurricane) in order to provide immediate **life-safety protection** when evacuation is not an option.





□ Accounting For All Persons Annex

This annex focuses on developing **courses of action** when **accounting** for the **whereabouts** and **well-being** of students, staff and visitors and identifying those who may be missing.

The planning team considers the following when developing its **goals, objectives** and **courses of action**:

- How staff determines who is in **attendance** at the **assembly area**.
- What to do when a student, staff member or guest **cannot be located**.
- How staff **reports** to the assembly supervisor.
- How and when students are **dismissed** or **released**.

□ Communications + Warning Annex

The *Communications and Warning Annex* includes **communication** and **coordination** during emergencies and disasters (both internal communication and communication with external stakeholders), as well as the communication of **emergency protocols** *before* an emergency and communication *after* an emergency.

The planning team considers the following when developing its **goals, objectives** and **courses of action**:

- How the school's **communications system integrates** into the local **disaster** and **response** law enforcement communication **networks** (e.g., fire department and law enforcement staff).
- How to ensure relevant staff members can **operate** communications **equipment**.
- How the school communicates with students, families and the broader community *before, during* and *after* an emergency.
- How to account for **technology barriers** faced by students, staff, parents and guardians.
- How to effectively address **language access barriers** faced by students, staff, parents and guardians.
- How the school handles the **media** (e.g., district or school Public Information Officer [PIO]).
- How impacts on students are communicated to the **community**, including the **impact** on **activities** related to the school but not necessarily at the school or during regular school hours (i.e., church use of school property and athletic events).
- How the school ensures effective communication with individuals with **disabilities** and others with **access and functional needs** (e.g., coordinating with first responders and local emergency managers to provide sign language interpreters for use during press conferences, publishing only accessible documents, ensuring information on websites is accessible).





□ Family Reunification Annex

The *Family Reunification Annex* details how students will be **reunited** with their **families** or **guardians**.

The planning team should consider the following when developing its goals, objectives and courses of action:

- How to **inform** families and guardians about the **reunification process** in advance and how to clearly describe their **roles** and **responsibilities** in reunification.
- How to **verify** that an **adult** is **authorized** to take custody of a student.
- How to **facilitate communication** between the **parent check-in** and the student **assembly** and **reunion areas**.

Telling Family Members Their Loved One Is Missing, Injured Or Killed

When reunification is not possible because a child is missing, injured or killed, how and when this information is provided to families is *critical*. Before an emergency, the planning team must determine **how**, **when** and by **whom** loved ones will be informed if their loved one is missing or has been injured or killed. **Law enforcement** typically takes the lead on **death notifications**, but *all* parties must understand their roles and responsibilities. This ensures that parents and loved ones receive accurate and timely information in a **compassionate manner**.

While law enforcement and medical examiner procedures must be followed, families should receive accurate information as soon as possible. Having **trained personnel** on hand or immediately available to talk to loved ones about death and injury ensures the notification is provided to family members with clarity and compassion. **Counselors** should be on hand to immediately assist family members.

The school EOP includes *pre-identified* points of contact (e.g., counselors, police officers) to work with and support family members. These points of contact are connected to families as *early* in the process as possible, including while children are still missing but also *before* any victims are positively identified. After an incident, it is critical to confirm that *each* family is getting the **support** it needs, including over the **long-term**.

The school EOP considers printed and **age-appropriate** resources to help families recognize and **seek help** in regard to a variety of reactions that they or their loved ones can experience *during* and *after* an emergency. Often, a family that has lost a child may have other children or another child in the school. It is critical that these families and loved ones are supported as they both grieve their loss and support their surviving child(ren).

The school EOP also explicitly addresses **how** impacted families and children are supported if they prefer not to engage with the **media**. This includes strategies for keeping the **media separate** from families and students while the emergency is ongoing, and support for families that may experience unwanted media attention at their homes.

- How to ensure students **do not leave** on their own.
- How to protect the **privacy** of **students** and **parents** from the **media**.





- How to *reduce* **confusion** during the reunification process.
- How *frequently* families are **updated**.
- How to account for **technology barriers** faced by students, staff, parents and guardians.
- How to effectively address **language access barriers** faced by students, staff, parents and guardians.

□ Continuity Of Operations (COOP) Annex

This annex describes how a school and district help ensure that **essential functions** *continue* during an emergency and its **immediate aftermath**. Essential functions include **business services** (payroll and purchasing), **communication** (internal and external), **computer** and **systems support**, facilities **maintenance**, **safety** and **security**, and continuity of **teaching** and **learning**.

The planning team considers the following when developing its goals, objectives and courses of action:

- How the COOP annex is designed so that it can be **activated at any time** and **sustained** for up to **30 days**.
- How the COOP annex **sets priorities** for **re-establishing** essential **functions**, such as restoration of school **operations** and maintaining the **safety** and well-being of students and the **learning environment**.
- How the COOP annex ensures students receive applicable **related services** in the event of a prolonged closure.

□ Recovery Annex

This annex describes how schools **recover** from an emergency. The **four (4)** most fundamental kinds of recovery are **academic** recovery, **physical** recovery, **fiscal** recovery and **psychological** and **emotional** recovery.

The planning team considers the following when developing its goals, objectives and courses of action:

- **Academic recovery**
 - When the school is **closed** and **reopened**, and who has the **authority** to do so.
 - What **temporary space(s)** the school may use if school buildings cannot be immediately reopened.
 - How to provide **alternate educational programming** in the event that students cannot physically reconvene.





- **Physical recovery**
 - How to **document school assets**, including physically accessible facilities, in case of damage.
 - Which personnel have **expert knowledge** of the schools’ assets, and how and where they **access records** to **verify** current assets after disaster strikes.
 - How the school works with **utility** and **insurance companies** before an emergency to support a quicker recovery.

- **Fiscal recovery**
 - How **district leadership** is included (e.g., superintendent, chief business officer, personnel director and risk manager).
 - How staff receives **timely** and **factual information** regarding returning to work.
 - What sources the school may **access** for emergency **relief funding**.

- **Psychological and emotional recovery**
 - Who serves as the **team leader**.
 - Where **counseling** and **psychological first aid** is provided.
 - How teachers create a **calm** and **supportive** environment for students, share **basic information** about the incident, provide **psychological first aid** (if trained) and **identify** students and staff who may need *immediate* crisis counseling.
 - Who provides **trained counselors**.
 - How to address **immediate, short-**, and **long-term** counseling **needs** of students, staff and families.
 - How to handle **commemorations, memorial** activities, or **permanent markers** and/or **memorial structures** (if any are allowed). This includes concerns such as when a commemoration site is closed, what is done with notes and tributes and how students are informed in *advance*.
 - How memorial activities strike a **balance** among **honoring the loss, resuming** school and class routines and schedules and **maintaining hope** for the *future*.
 - How the *Public Health, Medical and Mental Health Annex* informs the actions and plans of the *Recovery Annex*.





□ Public Health + Medical + Mental Health Annex

This annex describes the courses of action that the school implements to address emergency **medical** (e.g., first aid), **public health** and **mental health counseling** issues. Schools coordinate these efforts with the appropriate emergency medical services (EMS), public health, mental health, law enforcement, fire department and emergency management representatives. Mental health needs *after* an emergency is addressed in the *Recovery Annex*.

The planning team considers the following when developing **its goals, objectives** and **courses of action**:

- The **role** of staff members in providing **first-aid** during an emergency.
- Where emergency **medical supplies** (e.g., first-aid kits, automated external defibrillators [AEDs], etc.) are located and who is responsible for **purchasing** and **maintaining** those materials.
- Which staff have **relevant training** or **experience**, such as in first aid or CPR.
- How the school **secures** a sufficient number of **counselors** in the event of an emergency.
- How the school *promptly shares* and **report** information about **outbreaks** or **epidemics** or other unusual medical situations to the local health department.
- How the school supports the needs of students identified by the threat assessment team.

□ Security Annex

This annex focuses on the courses of action that schools implement on a **routine, ongoing** basis to secure the school from **criminal threats** originating from *both* inside and outside the school. This includes efforts done in conjunction with law enforcement personnel.

The planning team considers the following when developing its **goals, objectives** and **courses of action**:

- How agreements with law enforcement agencies address the **daily role** of law enforcement officers **in** and **around** school.
- How to ensure the building is **physically secure** (including implementation of crime prevention through environmental design [CPTED]).
- How to get students **to** and **from** school **safely** (including traffic control and pedestrian safety).
- How to keep **prohibited items** out of school.
- How to **respond** to threats identified by the **behavioral threat assessment** team.
- How **information** is **shared** with **law enforcement** officers or other **responders** keeping in mind any requirements or limitations of applicable privacy laws, including the *Family Educational Rights and Privacy Act of 1974* [FERPA], the *Health Insurance Portability and Accountability Act of 1996* [HIPAA], and civil rights and other laws. More information on





FERPA and HIPAA can be found in *A Closer Look, Information Sharing* section of this Guide and at the websites noted below.⁷

Crime Prevention Through Environmental Design (CPTED) Principles⁸

Natural surveillance – Arranging physical features to *maximize visibility*.

Natural access control – Guiding people with **signage**, **well-marked entrances** and **exits**, and landscaping while *limiting* access to certain areas by using **real** or **symbolic barriers**.

Territoriality reinforcement – Clearly **delineating space**, expressing pride and ownership and creating a welcoming environment.

Management and maintenance – Ensuring building services **function properly** and **safely**, and the exterior is properly maintained and organized with landscaping and plantings maintained and trimmed.

Other

School districts and individual schools may have *additional* or different annexes than those identified here, based on their assessment findings.

⁷<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html> and <http://www.hhs.gov/ocr/privacy/>

⁸*The American Clearinghouse on Educational Facilities*, available at <http://www.acefacilities.org>, provides additional information describing how CPTED can be applied in the school environment.





Threat- + Hazard-Specific Annexes

Threat- and hazard-specific annexes describe **courses of action** *unique* to **particular threats** and **hazards**. Courses of action already outlined in a functional annex need not be repeated in a threat- or hazard-specific annex.

Schools develop threat- and hazard-specific annexes based on the *prioritized list* of threats and hazards determined in the **assessment process**. As planning teams develop courses of action for threats and hazards, they consider local, State and Federal **regulations** or **mandates** that often apply to specific hazards.

If there is a functional annex that applies to one of the threat or hazard annexes, the latter includes the functional annex by reference. For example, if a *during* course of action for a fire hazard involves evacuation, and there is an *Evacuation Annex*, the *Fire Annex* indicates “see *Evacuation Annex*” in the *during* course of action section rather than repeat the evacuation courses of action in the *Fire Annex*.

School districts and individual schools may not need annexes for all of the threats identified below OR they may have *additional* or different annexes based on their risk assessment findings.

Table 7: THREAT + HAZARD TYPES + EXAMPLES

Threat + Hazard Type	Examples	
Natural Hazards	<ul style="list-style-type: none"> • Earthquakes • Tornadoes • Lightning • Severe wind • Hurricanes • Floods 	<ul style="list-style-type: none"> • Wildfires • Extreme temperatures • Landslides or mudslides • Tsunamis • Volcanic eruptions • Winter precipitation
Technological Hazards	<ul style="list-style-type: none"> • Explosions or accidental release of toxins from industrial plants or other external source • Accidental release of hazardous materials from within the school such as gas leaks or laboratory spills • Hazardous materials releases from major highways or railroads 	<ul style="list-style-type: none"> • Radiological release from nuclear power stations • Dam failure • Power failure • Water failure
Biological Hazards	<ul style="list-style-type: none"> • Infectious diseases, such as pandemic influenza, extensively drug-resistant tuberculosis, <i>Staphylococcus aureus</i> and meningitis • Contaminated food outbreaks, including <i>Salmonella</i>, botulism and <i>E. coli</i> 	<ul style="list-style-type: none"> • Toxic materials present in school laboratories
Adversarial, Incidental and Human-caused Threats	<ul style="list-style-type: none"> • Fire • Active shooter • Criminal threats or actions • Gang violence • Hostage situation • Suspicious package 	<ul style="list-style-type: none"> • Report of weapon(s) • Domestic violence or abuse • Cyber attacks • Suicide • Bomb threats
Other		



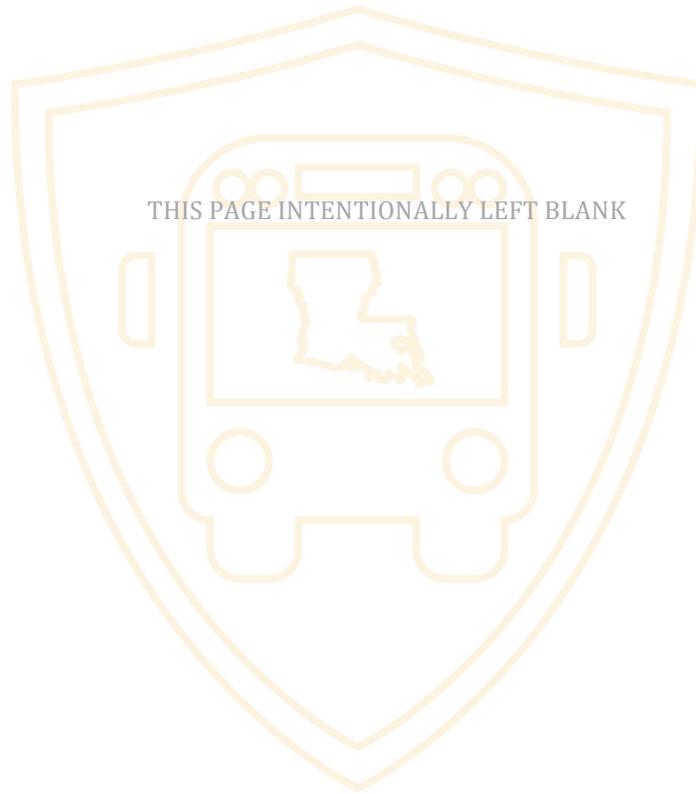




A Closer Look

Information Sharing
Psychological First Aid For Schools (PFA-S)
School Climate + Emergencies
Active Shooter Situations







A Closer Look

This section of the Guide provides users with information on **four (4) key topics** to enhance the implementation of their EOP. These topics are described in the following sections:

- **Information Sharing.** Provides an overview of the *Family Educational Rights and Privacy Act (FERPA)*, *Health Insurance Portability and Accountability Act (HIPAA)* and the implications that these Federal statutes have for **information-sharing** in the emergency planning process.
- **Psychological First Aid for Schools (PFA-S).** Describes this type of aid and how schools can use it to help students, staff and families *during and immediately* after a **traumatic incident**.
- **School Climate and Emergencies.** Describes how a **positive school climate** provides students with ready access to emotional and behavioral supports that can affect the capacity of students and staff to **prevent, respond** to and **recover** from emergencies.
- **Active Shooter Situations.** Describes *unique* challenges involved in preparing for, responding to and recovering from a **school-based shooting**.

Information Sharing

This section of *A Closer Look* provides an overview of the FERPA and the implications that this and other Federal statutes have for **information-sharing** in the emergency planning process. This section also provides a brief overview of the more limited circumstances when the HIPAA may apply to impact information-sharing in the **school setting**.

INFORMATION SHARING WHAT YOU NEED TO KNOW

While it is critical that schools comply with these laws, there is often confusion about their applicability, which results in schools sharing *less* than allowed with law enforcement officers or the appropriate authorities even when there is **appropriate cause** for sharing information. If schools **understand** when and how these laws apply, they can both ensure public safety and protect student privacy.

While this section of the Guide focuses on FERPA, and to a lesser extent HIPAA, there may State and Federal civil rights and other laws that **place restrictions** on **when** and **with whom** schools may share information. At the Federal level, for instance, public elementary and secondary schools are subject to Federal civil rights laws, including laws that prohibit discrimination based on disability (the *Americans with Disabilities Act [ADA]* and *Section 504 of the Rehabilitation Act of 1973*); race, color and national origin (Titles IV and VI of the *Civil Rights Act of 1964*); sex (Title IX of the *Education Amendments of 1972* and Title IV of the *Civil Rights Act of 1964*); and religion (Title IV of the *Civil Rights Act of 1964*). For example, Section 504 and Title II of the ADA⁹ **prohibit discrimination** on the

⁹Title II of the ADA prohibits discrimination based on disability by public entities, including public schools.





basis of disability, and generally prohibit **unnecessary** disclosures of disability status or information related to that disability, to third parties.¹⁰ Disclosures may be **necessary** when the student presents a significant, articulable **threat** to others.¹¹

Schools are *strongly* urged to take the time to review these laws, as well as others that apply in their jurisdictions, when working with their community partners to ensure that all parties have a **strong understanding** of applicable laws when deciding whether to disclose information. In particular, it is *critical* to **train school employees**, including contractors, on applicable laws to ensure that schools, school officials or employees **do not release information inappropriately** or make decisions about students or release of records based upon myths, fears or stereotypes related to race, color, national origin, sex, religion, disability, sexual orientation or gender identity.¹²

Family Educational Rights + Privacy Act (FERPA)

- What Is *Family Educational Rights + Privacy Act* (FERPA)?
- What Are Education Records?
- Who May Access FERPA-Protected Education Records?
- Balancing Safety + Privacy
 - Health Or Safety Emergency Exception To The Consent Requirement
 - Law Enforcement Unit Record Exception To The Definition Of Education Records
 - Common FERPA Misunderstandings
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- Incorporating FERPA Into Your Emergency Planning Process
 - What Information Is FERPA-Protected + When May The School Share It?
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- Frequently Asked Questions (FAQs) Pertaining To FERPA
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What Is FERPA?

Family Educational Rights and Privacy Act (FERPA) is a Federal law that **protects** the privacy of student **education records**. The law applies to all educational agencies and institutions that receive funds under *any* **U.S. Department of Education (DOE)** program (termed “schools” below). FERPA gives parents certain rights with respect to their children's education records. These rights transfer to

¹⁰See 34 CFR § 104.4; 28 CFR § 35.130; *Dear Colleague Letter and Frequently Asked Questions on Report Cards and Transcripts for Students with Disabilities Attending Public Elementary and Secondary Schools*, October 2008. Available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20081017.pdf>.

¹¹See 28 CFR 35.139. 11.

¹²For more information about applicable civil rights statutes, please visit www.justice.gov/crt, www.ed.gov/ocr or www.ada.gov. Information about appropriate training and management for school resource officers and law enforcement officials in schools may be found at www.cops.usdoj.gov.





the student when he or she reaches the **age of 18** or attends a school *beyond* the **high school level**. Students to whom the rights have transferred are “**eligible students.**” The **Family Policy Compliance Office (FPCO)** at DOE administers FERPA.

FERPA protects the rights of parents or eligible students to:

- **Inspect** and **review** education records.
- Seek to **amend** education records.
- Consent to the disclosure of **personally identifiable information (PII)** from education records, *except* as specified by law.

For a thorough review of FERPA, in addition to what is provided in this document, please see the implementing regulations for FERPA, found in Title 34 of the *Code of Federal Regulations (CFR)*, Part 99, and the resources and guidance documents listed at the end of this section.

What Are Education Records?

Different types of records and information may be **protected** by FERPA if determined to be “**education records.**” Education records are protected by FERPA and are *broadly* defined as records that are *directly related to a student* and **maintained** by an educational agency or institution, or by a party acting for the agency or institution.

The non-exhaustive chart below shows several **examples** of what types of records generally are and are not considered to be education records.

Table 8: EDUCATION RECORDS

Education Records	Not Education Records
Transcripts	Records that are kept in the <i>sole possession</i> of the maker and used only as personal memory aids.
Disciplinary records	Law enforcement unit records.
Standardized test results	Grades on peer-graded papers before they are collected and recorded by a teacher.
Health (including mental health) and family history records	Records created or received by a school after an individual is no longer in attendance and that are not <i>directly</i> related to the individual’s attendance at the school.
Records on services provided to students under the <i>Individuals with Disabilities Education Act (IDEA)</i>	Employee records that relate <i>exclusively</i> to an individual in that individual’s capacity as an employee .
Records on services and accommodations provided to students under <i>Section 504 of the Rehabilitation Act of 1973</i> and <i>Title II of the ADA</i> ¹³	Information obtained through a school official’s personal knowledge or observation and not from the student’s education records.

¹³Schools should also consider carefully whether information they are requiring for student enrollment in services, including special education services, will tend to identify a student as a person with a disability and determine to what extent laws other than FERPA should be considered *before* release of that information **without consent**. In addition, release of details about some disabilities or accommodations that permit the student to be identified could constitute on the basis of disability pursuant to the ADA or the *Rehabilitation Act* or other civil rights statutes.





See the discussion under *Balancing Safety and Privacy* below for more detail on law enforcement units under FERPA, what constitutes a law enforcement unit record and how these records may be used.

Who May Access FERPA-Protected Education Records?

According to the law, “School officials with a **legitimate educational interest**” may access FERPA-protected education records. Schools determine the criteria for who is considered a school official with a **legitimate educational interest** under FERPA regulations, and it generally includes **teachers, counselors, school administrators** and other **school staff**.

The term “school official with a legitimate educational interest” may also include **contractors, consultants, volunteers** and **other parties** if those individuals:

- i. Perform an **institutional service or function** for which the agency or institution would otherwise use employees.
- ii. Are under the **direct control** of the agency or institution with respect to the use and maintenance of education records.
- iii. Are subject to the requirements of 34 CFR § 99.33(a), which specifies that individuals who receive information from education records may use the information only for the purposes for which the disclosure was made and which generally **prohibits** the **re-disclosure** of PII from education records to any other party without the prior consent of the parent or eligible student. There are, however, exceptions to this prohibition.

In addition, schools must **annually notify parents** and **eligible students** of their rights under FERPA, and must include in this notification the criteria for **who** constitutes a school official and **what** constitutes a **legitimate educational interest**.

DOE provides **model notification statements** on its website at <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/lea-officials.html>.¹⁴

This means that if a school wishes to consider non-employee members of its threat assessment team (TAT), its contracted counseling, nursing, service or security staff, its school resource officers (SROs) and other non-employees as “school officials” who may have access to education records, the school must **ensure** that these individuals **meet the criteria** in the bullets above and the criteria in the school’s **annual notification** of FERPA rights. Schools are encouraged to **train** all school officials who may have access to education records, including contractors, on FERPA as well as other applicable laws.

Balancing Safety + Privacy

School officials must **balance** safety interests and student privacy interests. FERPA contains *exceptions* to the **general consent** requirement, including the “health or safety emergency exception,” and exceptions to the definition of education records, including “law enforcement unit records,” which provide school officials with tools to support this goal.

¹⁴See 34 CFR § 99.7(a)(3)(iii) for further information. Available at <http://www2.ed.gov/policy/gen/reg/ferpa/index.html>.





Health Or Safety Emergency Exception To The Consent Requirement

FERPA generally requires **written consent** before disclosing PII from a student's education records to individuals other than his or her parents. However, the FERPA regulations permit school officials to **disclose** PII from education records without consent to appropriate parties *only* when there is an **actual, impending or imminent emergency**, such as an articulable and significant threat. Information may be disclosed *only* to **protect** the health or safety of students or other individuals. In applying the health and safety exception, note that:

- Schools have **discretion** to determine what constitutes a health or safety emergency.
- “Appropriate parties” typically include **law enforcement officials, first responders, public health officials, trained medical personnel** and **parents**. This FERPA *exception* is temporally *limited* to the **period of the emergency** and does not allow for a blanket release of PII. It does not allow disclosures to address emergencies that might occur, such as the case in emergency preparedness activities.
- The information that may be disclosed is *limited* to *only* PII from an **education record** that is **needed** based on the type of emergency.
- Disclosures based on this exception must be **documented** in the student's education records to memorialize the:
 - **Emergency** that formed the basis for the disclosure.
 - Parties with whom the school **shared** the PII.

DOE does not find a school in violation of FERPA for disclosing FERPA-protected information under the health or safety exception as long as the school had a **rational basis**, based on the information **available** at the **time**, for making its determination that there was an articulable and significant threat to the health or safety of the student or other individuals.¹⁵

Law Enforcement Unit Record Exemption To The Definition Of Education Records

FERPA defines a “law enforcement unit” as any individual, office, department, division or other component of an educational agency or institution, such as a unit of commissioned police officers or non-commissioned security guards, that is **officially authorized** or **designated** by that agency or institution to:

- Enforce any local, State or Federal law, or refer to appropriate authorities a matter for **enforcement** of *any* local, State or Federal law against any individual or organization other than the agency or institution itself.

¹⁵For more information on the health or safety exception, see: *Addressing Emergencies on Campus*, June 2011, available at <http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf> and 34 CFR §§ 99.31(a)(10) and 99.36.





- Maintain the **physical security** and **safety** of the agency or institution.

Significantly, to be considered a “law enforcement unit” under this definition, an individual or component *must* be **officially authorized** or **designated** to carry out the functions listed above by the school. Schools may designate a **traditional law enforcement entity** (such as **school security staff, school resource officers [SROs], school safety officers, school police** or **other school security personnel**) as a law enforcement unit, or opt to designate another **non-law enforcement** school official to serve as their law enforcement unit, such as a **vice principal** or another school official.

FERPA does not **prevent** schools from **disclosing information** from records maintained by law enforcement that were created for law enforcement purposes by the law enforcement unit to anyone, subject to State law, including outside law enforcement authorities, without the consent of the parent or eligible student during an emergency or otherwise.

Law enforcement unit records, which are **not subject** to the FERPA consent requirements, are defined as records that are:

- Created *by* a **law enforcement unit**.
- Created *for* a **law enforcement purpose**.
- *Maintained* by the **law enforcement unit**.

Law enforcement unit records **do not** include:

- Records created by a law enforcement unit for a law enforcement **purpose** that are **maintained** by a component of the **school** other than the law enforcement unit, such as a principal or guidance counselor.
- Health records or PII collected about or related to the **disability** of a student, including information about providing an accommodation.
- Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as a **school disciplinary action** or **proceeding**.

In designating a law enforcement unit and using law enforcement **unit records**, note that:

- To be given access to PII from a student’s education records, law enforcement unit officials **employed by the school** *must* meet the criteria set forth in the school’s FERPA notification for school officials with a **legitimate educational interest**. While law enforcement unit officials are not required to be **school officials** under FERPA, many schools have found that it is useful for them to be school officials so that they may access education records that may be necessary to ensure school safety. For instance, if a student has been suspended for a period of time (a fact that would be recorded in the student’s education records), the law enforcement unit could need to know this in the event the student attempts to enter the building when not permitted to do so.
- A school’s law enforcement unit officials *must* protect the **privacy** of education records they receive and may disclose them *only* in **compliance** with FERPA. For that reason, we





recommend that law enforcement unit records be maintained *separately* from education records.¹⁶

Common FERPA Misunderstandings

School administrators and their partner organizations must understand FERPA and its implications because misinterpretations of the law and subsequent delays in information-sharing can **hinder** first responders' efforts to provide **necessary assistance** in a health or safety emergency.

Sharing Personal Observation Or Knowledge

Misinterpreting FERPA can lead school administrators to **miss opportunities** to **share crucial information** that could *prevent* an emergency situation. For instance, some schools incorrectly believe that information obtained from a school official's personal observations or knowledge is protected by FERPA. In fact, personal observation or knowledge is generally not considered to be part of the student's education records (see *What Are Education Records* above) and Therefore may be disclosed. For example, if a teacher **overhears** a student making threatening remarks to other students, the teacher is **not prohibited** from sharing that information with appropriate authorities, including the parents of the students who were threatened.

However, if a school official learns of information about a student through his or her **official role** in **creating** or **maintaining** an **education record**, then that information is covered by FERPA. For instance, if a principal suspends a student, the principal would **not be permitted** to non-consensually disclose that information (unless the disclosure met one of the exceptions in FERPA to consent) because he or she gained personal knowledge of that information in making that disciplinary determination.

Releasing Directory Information

In some circumstances, schools may be able to disclose **directory information** to prevent an emergency situation. Directory information means information contained in a student's education record that would **not** generally be considered **harmful** or an **invasion of privacy** if disclosed.

Some **examples** of directory information include a **student's name, address, telephone number** or **email address**. Schools *must* follow **certain requirements** in publicly designating "directory information," and they may not disclose directory information from a student's education record if the parent or eligible student has **opted out** of allowing that disclosure. For example, assuming that the parents' cell phone numbers have been properly designated as **directory information**, what if the parents **have not opted out** of the disclosure of such directory information, and a **flood displaced families** from their homes and these children are brought to a shelter? The school may disclose those parents' cell phone numbers to an emergency management agency that is trying to locate the parents.

¹⁶For more information on law enforcement unit records and FERPA, refer to the following sources:

- *Addressing Emergencies on Campus*, June 2011 <http://www2.ed.gov/policy/gen/guid/fpco/pdf/emergency-guidance.pdf>.
- The discussion in the **preamble** to the *Final Rule* in the Federal Register published December 9, 2008, starting on page 74836 <http://www2.ed.gov/legislation/FedRegister/finrule/2008-4/120908a.pdf>.
- **Family Policy Compliance Office** website <http://www.ed.gov/policy/gen/guid/fpco/index.html>.
- The **regulatory definition** of "Law Enforcement Unit" under FERPA in 34 CFR § 99.8(a) <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=ae535d41f8bb03bedfef79634883360f&n=34y1.1.1.1.33&r=PART&ty=HTML#34:1.1.1.1.33.1.132.8>.





Additional Situations With FERPA Considerations

FERPA has implications in a variety of different situations, and new questions arise as schools become more creative and innovative in developing their campus safety plans. In many cases, however, it is helpful to review the **FERPA basics** to help you clearly think through each scenario. The following are some scenarios that may arise.

- **Infectious disease**

Under the health or safety emergency exception, school officials may, **without consent**, disclose PII from education records to appropriate parties in connection with an emergency. In the case of an **influenza outbreak**, for instance, if school officials determine that an emergency exists, they **may share** immunization records with parties such as local and State public health officials whose knowledge of the information is necessary to protect the health or safety of students or others in the school community. Under this exception, schools may share information only during the *limited* period of time connected with the emergency. **A blanket release of information is not allowed.** You must instead determine what information to disclose on a **case-by-case** basis depending on the particular threat.

- **Threat Assessment Teams (TATs)**

Some educational agencies and institutions may need assistance in determining whether a health or safety emergency exists for purposes of complying with FERPA. Federal agencies encourage schools to implement a threat assessment program, including the establishment of a **multidisciplinary Threat Assessment Team (TAT)** that utilizes the expertise of representatives from mental health service providers, persons familiar with **emergency procedures and law enforcement agencies** in the community.

The TAT **must comply** with applicable civil rights and other State and Federal laws. Under a properly implemented threat assessment program, schools can respond to student behavior that raises safety concerns that are not based on **assumptions, stereotypes or myths** about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion or sex.

If a TAT member meets the definition of a school official (as a party to whom the school has **outsourced administrative functions or services**) with a **legitimate educational interest** under FERPA, (see *Who May Access FERPA-Protected Education Records* above), he or she is able to **access** students' education records in which he or she has legitimate educational interests. A TAT member who is appropriately **designated** as a school official **may not disclose** PII from education records to anyone without consent *unless* one of the exceptions to consent under FERPA, such as the health or safety emergency exception, applies.

- **Security videos**

Schools are increasingly using security cameras as a tool to monitor and improve student safety. Images of students captured on security videotapes created and maintained by the school's law enforcement unit for a law enforcement purpose **are not considered education records** under FERPA. Accordingly, these videotapes **may be shared** with parents of students whose images are on the video and with outside law enforcement authorities, as appropriate.





Incorporating FERPA Into Your Emergency Planning Process

Below are critical questions and concepts that schools should discuss with their community partners while in the process of **developing** or **revising** an emergency management plan. While building partnerships is critical, in gathering information to support these partnerships, schools must also take steps to consider **student privacy** and **civil rights** and **other** laws as well as their mission of safety. Be sure to refer to the sections elsewhere in this guidance to review any concepts with which you are unfamiliar.

What Information Is FERPA-Protected + When May The School Share It?

Education records are protected by FERPA and schools may generally *only* share PII those records with **written consent** from a parent or eligible student, unless a FERPA exception to consent applies. (See *What Are Education Records* above.) The following are examples of such exceptions.

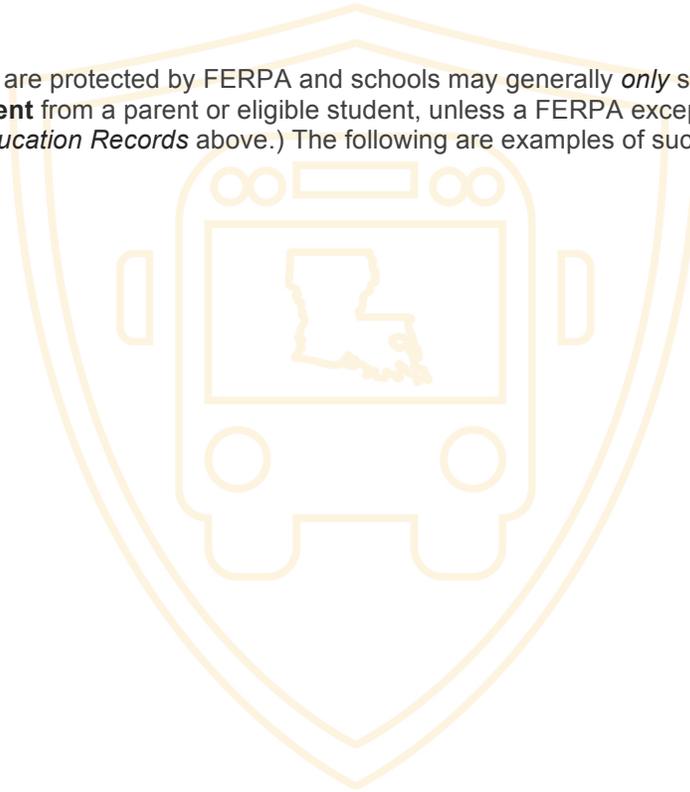




Table 9a: EXAMPLES OF FERPA INFORMATION-SHARING REQUIREMENTS

Example: At the start of **flu season**, your local public health agency requests the names of those students showing **influenza-like symptoms**, as well as their **parents’ contact information**. You know that you may not disclose PII from a student’s education records without consent if there is not a health or safety emergency or another exception to consent under FERPA that applies.

So, to facilitate this sharing of information, you opt to develop a consent form that identifies students’ names and parent contact information as specific PII from student education records. And you would like to share the form with the local public health agency, as well as the **purpose of the disclosure**. The form gives parents and eligible students the *option* to allow or to not allow this sharing of information. After collecting the signed and dated consent forms, for the students for whom you received consent you begin to share with the local health agency the names of students who are showing influenza-like symptoms and their parents’ contact information. Your purpose of this sharing of PII is to help so the health agency is able to conduct **real-time surveillance** to prevent the spread of the illness. (See *What Is FERPA* above.)

Example: Your school’s TAT includes representatives from your **community partners** and you have properly designated them as **“school officials with a legitimate educational interest.”** (See *Who May Access FERPA-Protected Records* above.)

The local law enforcement representative on your team **does not share** with his police chief or other law enforcement official the PII that he obtains from a student’s education records in his capacity as a TAT member while working to identify possible threats because he knows that this is not permitted.

Several months *after* the TAT **initially convened** to review a collection of behaviors and communications concerning a particular student and determined that there was **not sufficient information** demonstrating that the student posed a threat, the team learns that the student has **now communicated his intent to harm** the school principal. At this juncture, the law enforcement representative (and other members of the TAT) **shares** pertinent PII from education records with **appropriate parties** so they can take steps, such as consulting with a police agency, to protect the health or safety of the principal (in this case). (See also the discussion of TAT under *Additional Situations With FERPA Considerations* above.)

Example: At the beginning of the school year, your school **notified parents** and **eligible students** that you had designated **students’ names, phone numbers** and **e-mail addresses** as **directory information**, explaining to them that you would disclose this information **upon request** to *anyone* contacting the school. In your notice, you also explained **how** and **by when** they could **opt out**. When a reporter contacts your institution requesting the directory information about a student who is **under 18**, you **check** to determine whether the student’s parents opted out of the disclosure of directory information.

What Information Is Not FERPA-Protected + When May The School Share It?

Records that are created and maintained by a school’s law enforcement unit for a law enforcement purpose are not protected by FERPA, and there are no FERPA restrictions on the sharing of information in law enforcement unit records. (See “What Are ‘Education Records’” and “Balancing Safety and Privacy” above.)





Table 9b: EXAMPLES OF FERPA INFORMATION-SHARING REQUIREMENTS

Example: Your school contracts with the law enforcement agency in your Parish to bring in an SRO. You **properly designate** the officer as a “**school official with a legitimate educational interest.**” (See *Who May Access FERPA-Protected Records?* above.) You also **properly designate** the SRO as your school’s law enforcement unit. (See *Balancing Safety and Privacy* above.)

Example: The SRO knows that she **may not re-disclose** to her home agency PII that she obtains from a student’s education records while serving in her SRO capacity, *unless* there is a health or safety emergency or another FERPA **exception to consent** that would apply. However, she shares her law enforcement unit records about a student who was arrested for smoking marijuana on campus with other law enforcement officials because she knows that **law enforcement unit records are not protected** by FERPA.

Are Processes + Protocols, Including Memoranda Of Understanding (MOUs), In Place For Information Sharing + Record Keeping That Comply With FERPA?

It is important for schools to **consider entering into MOUs** with law enforcement and their other community partners to **formalize roles, responsibilities and protocols**. MOUs can be tailored to the needs of the individual schools in the jurisdiction. Any policies regarding information sharing between the school and the law enforcement agency, however, **must comply** with applicable local, State and Federal laws, including FERPA. While information-sharing MOUs should be developed regarding what information can be shared between departments and what information is protected, **no provision** in an MOU can **override a school’s obligations** under FERPA.

Frequently Asked Questions (FAQs) Pertaining To FERPA

Q: To what entities does FERPA apply?

A: FERPA applies to **educational agencies** and institutions that **receive funds** under *any* program administered by the **U.S. Department of Education (DOE)**. This includes virtually *all* **public schools** and **school districts** and *most* **private** and **public postsecondary** institutions, including medical and other professional schools.

Private and religious schools at the elementary and secondary school levels generally **do not receive funds** from the DOE and, therefore, are **not subject** to FERPA.

Q: Does an interagency agreement with partners such as the local or State health department enable a school to non-consensually disclose education records?

A: No. Interagency agreements **do not supersede** the **consent requirements** under FERPA. Although an interagency agreement is a **helpful tool** for planning purposes, schools **must comply** with FERPA requirements regarding the disclosure of PII from students’ education records.

Q: Under the health or safety emergency exception, may a school non-consensually disclose PII from a student’s education records to the media?

A: No, you generally **may not disclose** FERPA-protected information to the media. While the media play a role in alerting the community of a health epidemic or a violent incident outbreak, they generally **do not** have a **role** in protecting the health or safety of individual students or others at the school.





Q: When does the health or safety exception apply?

A: Under FERPA, an emergency means a situation in which there is an **articulable** and **significant threat** to the health or safety of students or other individuals. **This determination is made by the school.**

Q: Do I need to tell parents and eligible students or otherwise document when I have disclosed PII from their education records without consent under a health or safety emergency?

A: Within a reasonable period of time *after* a disclosure is made under the health or safety exception, a school *must record* in the student’s education records the articulable and significant threat that formed the basis for the disclosure, and the parties to whom the information was disclosed. Parents and eligible students have a right to **inspect** and **review** the **record of disclosure**, but do not need to be *proactively* informed that records have been disclosed.

Q: Can members of our TAT have access to student education records?

A: School officials with “**legitimate educational interests**” may have access to a student’s education records. Members of a TAT who are not school employees may be **designated** as such if they are under the *direct control* of the school with respect to the maintenance and use of PII from education records; are subject to the **requirements of 34 CFR § 99.33(a)** governing the use and re-disclosure of PII from education records; and otherwise meet the school’s **criteria** for being “**school officials with legitimate educational interests.**”

Members of a TAT who are considered “**school officials with a legitimate educational interest**” generally **cannot non-consensually re-disclose** PII from a student’s education records to which he or she was privy as part of the team. However, if a threat assessment team determines that a health or safety emergency *exists*, members **may non-consensually re-disclose** PII from a student’s education records on behalf of the school to appropriate officials under the health or safety emergency exception.

For example, a representative from the city police who **serves** on a school’s TAT *generally* cannot re-disclose, **without consent**, PII from a student’s education records to the city police during the *initial* discussions about a particular student. However, once the threat assessment team **determines** that a **health or safety emergency exists**, as defined under FERPA, the representative **may re-disclose without consent**, PII from a student’s education records on behalf of the school to appropriate officials. (See the discussion under *Additional Situations with FERPA Considerations* above.)

Q: How does FERPA interact with the Health Insurance Portability and Accountability Act of 1996 (HIPAA)?

A: DOE and the U.S. Department of Health and Human Services (DHH) *jointly* developed **guidance** on the application of FERPA and HIPAA. This guidance explains that records that are protected by FERPA are exempt from the HIPAA Privacy Rule. Accordingly, school officials **must** follow the **requirements** of FERPA with regard to the disclosure of records protected by FERPA. Please see the guidance at <http://www2.ed.gov/policy/gen/guid/fpco/doc/ferpa-hipaa-guidance.pdf> for more information, as well as the HIPAA guidance in this *A Closer Look* section.





Q: Whom should I contact for more information related to FERPA?

A: The DOE's **Family Policy Compliance Office (FPCO)** is available to respond to any questions about FERPA. For quick responses to routine questions, please email the DOE at FERPA@ed.gov.

For more in-depth **technical assistance** or a more formal response, call the **Family Policy Compliance Office** at **202-260-3887** or **write to them at:**

**Family Policy Compliance Office
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202-8520**

Q: What are some of the other State and Federal laws relating to emergency management planning that are relevant to access to and sharing of information about students?

A: As noted in the introduction to this *A Closer Look* section, schools may also be subject to State and Federal **civil rights laws** that **protect the disclosure of information** about students. Schools and their community partners should review guidance from the DOE and the **U.S. Department of Justice** on any applicable civil rights or other statutes **governing privacy** and information sharing and discuss their implications for emergency management and related planning processes. At a minimum, in **determining** what constitutes an “emergency,” schools and their partners must base their decisions on **actual risks** and **not on assumptions, stereotypes, fears or myths** about people with disabilities (including mental health-related disabilities) or people of a particular race, color, ethnicity, national origin, religion or sex.^{17,18}

FERPA Guidance + Resources

The FPCO at DOE administers FERPA. FPCO has developed, and *continues* to develop, **extensive guidance** pertaining to the implementation of FERPA and **emergency situations**.¹⁹

¹⁷See Title 28 of the *Code of Federal Regulations*, Section 35.139.

¹⁸In enacting the *Americans with Disabilities Act (ADA)*, Congress relied on *School Board of Nassau County, Florida v. Arline*, 480 U.S. 273, (1987) to “acknowledged that society’s accumulated myths and fears about disability and disease are as handicapping as are the physical limitations that flow from actual impairment.” As explained in the preamble to the Justice Department’s 1991 ADA regulation, codification of the Arline standard was deemed essential if the ADA is to achieve its goal of **protecting disabled individuals from discrimination based on prejudice, stereotypes or unfounded fear**, while giving appropriate weight to legitimate concerns, such as the need to avoid exposing others to significant health and safety risks. See 28 C.F.R. pt. 36, app. C, sec. 36.208. This rationale applies with equal force to making determinations based on stereotypes about other characteristics protected by Titles IV and VI of the *Civil Rights Act of 1964*.

¹⁹For more detailed information or additional guidance, please see the documents below and the FPCO website at www2.ed.gov/fpcoco.





Health Insurance Portability + Accountability Act Of 1996 (HIPAA)

- What Is Health Insurance Portability + Accountability Act of 1996 (HIPAA)?
- How Does HIPAA Apply In Schools?
- HIPAA Guidance + Resources.

What Is HIPAA?

The *Health Insurance Portability and Accountability Act of 1996* (HIPAA) and its **implementing regulations** – commonly known as the **HIPAA Privacy Rule** and the **HIPAA Security Rule** – protects the privacy and security of individually **identifiable health information**, called *protected health information* or PHI, held by **health plans, health care clearinghouses, and most health care providers**, collectively known as **covered entities**, and their business associates (entities that have access to individuals' health information to perform work on behalf of a covered entity).

Privacy Rule

The Privacy Rule, or *Standards for Privacy of Individually Identifiable Health Information*, establishes **National standards** to **protect** the privacy of individuals' **identifiable health information**. In doing so, the Privacy Rule sets forth the circumstances under which covered entities and their business associates **may use** or **disclose** an individual's health information, requires **safeguards** to protect the information, and gives individuals rights, including rights to examine and obtain a copy of their health records and to request corrections.

A major goal of the Privacy Rule is to ensure that individuals' health information is **properly protected** while allowing the flow of health information needed to **provide and promote high quality health care** and to **protect the public's health** and well-being. Given that the health care marketplace is diverse, the Privacy Rule is designed to be flexible and comprehensive to cover the variety of uses and disclosures that need to be addressed.

Security Rule

The Security Rule, or *Security Standards for the Protection of Electronic Protected Health Information*, establishes a National set of **security standards** for **protecting health information** that is held or transferred in **electronic form**. The Security Rule sets out the **technical, administrative** and **physical safeguards** that covered entities and business associates must put in place to **secure individuals' electronic health information**. The Security Rule is designed to be flexible and scalable, and technology neutral, so a covered entity or business associate can implement policies, procedures and technologies that are **appropriate** for the entity's particular size, organizational structure and risks to consumers' electronic health information.

The U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR) has responsibility for administering and enforcing the Privacy and Security Rules.





How Does HIPAA Apply In Schools?

Generally, HIPAA **does not apply** to student health information maintained by a school. While schools and school districts may maintain student health records, these records are in most cases not protected by HIPAA. Rather, student health information maintained at a school would be considered education records protected by the *Family Educational Rights and Privacy Act* (FERPA).

HIPAA **may apply** however to patient records at a university hospital, which may include records **on students** and **non-students**, or to the health records of non-students at a university health clinic.

During the emergency planning process, if you believe health information to which access may be needed is covered by HIPAA, consult the guidance and resources below for further information about how HIPAA applies.

HIPAA Guidance + Resources

HHS Office for Civil Rights (OCR) has developed, and *continues* to develop, **extensive guidance** pertaining to the implementation of HIPAA Privacy Rule and **emergency situations**. The OCR website has guidance about the intersection between HIPAA and FERPA and the release of PHI for **common emergency preparedness** issues and **public health purposes**, such as terrorism preparedness and outbreak investigations.²⁰

Psychological First Aid For Schools (PFA-S)

Psychological First Aid for Schools (PFA-S) is an **evidence-informed intervention** model to assist students, staff and families in the **immediate aftermath** of an emergency and can be used by any **trained** staff member or community partner. Trauma-related distress can have a long-term impact. PFA-S uses brief interventions to produce positive results that last.

PFA-S is designed to reduce the **initial distress** caused by emergencies, allows for the expression of difficult feelings and assists students in developing **coping strategies** and **constructive actions** to deal with fear and anxiety. A growing body of research shows that there are brief, effective interventions that have a long-lasting positive influence on trauma-related distress.

PFA-S is intended for **students, school personnel** and **families** who have been exposed to a disaster or other emergency. Whether an emergency occurs on school grounds or in the community at large, schools serve as a central location for professionals to assist children, families, school personnel and school partners.

PFA-S is most effective **immediately** following or even *during* an incident. In some circumstances, assuming the safety of students and staff has been ensured, PFA-S can be initiated **while an incident is still occurring**, such as in shelter-in-place or lockdown.

Students and staff may experience a broad range of reactions (e.g., physical, cognitive, psychological, behavioral, spiritual) to an emergency. Some of these reactions can cause distress that **interferes** with **adaptive coping**. Support from informed, compassionate and caring professionals can help

²⁰For more detailed information or additional guidance, please see the HHS OCR website at <http://www.hhs.gov/ocr/privacy/index.html> and the HHS/DOE HIPAA/FERPA guide at <http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveridentities/hipaaferpajointguide.pdf>.





students and staff members recover from these reactions. PFA-S has the potential to *decrease* the likelihood of **mental health problems** or **long-term difficulties** by identifying individuals who may need additional services and linking them to such services as needed.²¹

PFA-S assists students, staff and families by:

- Establishing a **positive connection** in a *non-intrusive*, compassionate manner.
- Enhancing immediate and ongoing safety and providing **physical** and **emotional** comfort.
- **Calming** and **orienting** those who are emotionally overwhelmed or distraught.
- Helping to identify their *immediate needs* and **concerns** and offering **practical assistance** and information to help address these needs and concerns.
- Empowering individuals to take an **active role** in their recovery by acknowledging their coping efforts and strengths and supporting adaptive coping.
- When appropriate, linking those in need to other relevant school or community resources such as school **counseling services**, **peer support programs**, **afterschool activities**, **tutoring**, **primary care physicians**, **local recovery systems**, **mental health services**, **employee assistance programs**, **public-sector services** and **other relief organizations**.

Training School Staff

Because PFA-S is not psychotherapy, an extended treatment or a stand-alone mental health intervention, **any trained staff member**, regardless of whether he or she has had formal mental health training, can deliver aspects of PFA-S and can contribute to the school recovery by functioning within the PFA framework. Schools can find training resources, including the PFA-S *Field Operations Guide*, at <http://www.nctsn.org/content/psychological-first-aid-schoolspfa>.

Similarly, **trained** members of community emergency response agencies and mental health professionals may provide PFA-S. *During* and *after* an emergency, teachers and other staff are a *critical* link in **promoting resilience**, in recognizing the signs of **traumatic stress** and in helping **students** and their **families** regain a sense of normalcy.

School Climate + Emergencies

School climate describes a range of **campus conditions**, including safety, relationships and engagement, and the environment, that may influence student learning and well-being. Positive school climates that promote **student learning** and well-being often feature:

- Safe environments **free of violence**, bullying, harassment and substance use.
- Appropriate **facilities** and physical surroundings.

²¹Melissa Brymer, Matt Taylor, Pia Escudero, Anne Jacobs, Mindy Kronenberg, Robert Macy, Lou Ann Mock, Linda Payne, Robert Pynoos, and Juliet Vogel, *Psychological First Aid For Schools: Field Operations Guide, 2nd Edition*. Los Angeles: National Child Traumatic Stress Network, 2012.





- Supportive **academic settings**.
- Clear and fair **disciplinary policies**.
- Respectful, trusting and **caring relationships** throughout the school community.
- Available **social, emotional** and **behavioral** supports.

Positive school climates are **inclusive** of and **responsive** to students of all backgrounds, regardless of race, color, national origin, language, disability, religion, sex, sexual orientation or gender identity.

Research shows that creating positive school climates helps districts, schools and teachers meet key goals, including: **boosting student achievement** and **closing achievement gaps**; *increasing high school graduation rates*; *decreasing teacher turnover* and *increasing teacher satisfaction*; and turning around **low-performing schools**.

Positive school climates also *enhance safety* in the school and community by *increasing communication* between students, families and faculty. At the same time, schools *reduce* various forms of harm to students that can stem from negative school climates, including violence, bullying and even suicide.

A positive school climate that provides students with ready access to **emotional** and **behavioral** supports can affect the capacity of students and staff to prevent, respond to and recover from emergencies.

Prevention

A positive school climate helps to *prevent emergencies* because it can *reduce* the incidence of behaviors that can contribute to crisis (e.g., violence, bullying, harassment, substance abuse). Further, schools with positive school climates **engage students** in developing **strong relationships** with staff and peers, *increasing* the likelihood that students will quickly report potential threats to trusted adults within the school.

Response

Schools with positive school climates teach students the **social and emotional competencies** that enable them to develop persistence, tolerance of frustration and ability to manage their emotions during an emergency. The teachers, counselors, school resources officers and other staff who create positive school climates **train** regularly on child and adolescent development, and on how to **respond appropriately** to a variety of student behaviors so they are able to *de-escalate* aggressive behavior *before* it becomes a **threat** to school safety.

Recovery

A positive school climate helps in the recovery from an emergency because it represents a **commitment**, even *prior* to an emergency, to providing **emotional** and **mental health services** and supports to all members of the community. Schools with such a climate create an environment that recognizes the **importance** of **social** and **emotional health**, and so support the recovery of all members of the school community and promote an understanding that individual needs vary in a *post-emergency* situation.





The following steps when implemented as part of a *single*, **comprehensive** and **integrated** strategy for improving student health and safety help schools promote a positive school climate.

□ Conduct A Comprehensive Needs Assessment

School communities are **complex systems** that include multiple stakeholders and interconnecting environmental factors that influence student health and safety. As such, comprehensive needs assessments of school climate including school engagement, school safety and the school environment, as elements to be evaluated, can provide schools with the data support needed to pursue **comprehensive approaches** to *improving* school climate. A comprehensive picture of school health and safety is created by utilizing needs assessments that include **student perceptions** and, where appropriate, **parent** and **staff perceptions**, to help schools **identify** key issues in need of attention. By monitoring indicators such as the frequency and severity of **student risk behaviors**, and perceptions of their safety, schools identify threats to school safety and then use this information to implement the **appropriate intervention** or **program** to *improve school safety*. These data can be most effective when they are used regularly for decision-making and are disaggregated by different groups to determine how they experience the school environment. If a student survey is used to assess culture and climate, student privacy must be protected, including in accordance with the *Protection of Pupil Rights Amendment*, 20 U.S.C. 1232, if applicable.²²

The center also houses **archived webinars** that provide information on how to use these surveys and the data that they collect. Visit at <http://safesupportiveschools.ed.gov/index.php?id=65>.

□ Use Multi-Tiered Interventions + Supports

School climate can be enhanced by a **data-driven, multi-tiered framework** that provides a continuum of **behavioral supports** and **interventions** to *improve* student behavior and achievement. A three-tiered framework is comprised of the following:

- **Tier 1: School-wide or universal interventions** and supports focus both on **developing** expected behaviors and social-emotional competence, and on *preventing* problem behavior.
- **Tier 2:** A second tier of interventions targets groups of students who are at **elevated levels of risk** or exhibiting **problem behavior** (such as bullying). These groups of students can be identified more easily, and their needs or behavior addressed more effectively when a school-wide foundation is in place.
- **Tier 3:** A third tier of interventions targets individual students, including traumatized youths, who are at even *more elevated levels* of academic and social-emotional behavioral need and **risk**.

While **interventions** for students who are at elevated levels of risk address their needs and problem behaviors, they should also build the skills that support thriving in life and **resiliency** in crisis. Using an evidence-based, multi-tiered behavioral framework has been found to *improve* school climate by **reducing problem behaviors** like bullying, drug abuse and poor attendance, while making students

²²A number of these surveys are in the compendium of school climate measures on the National Center on Safe Supportive Learning Environments' website at <http://safesupportiveschools.ed.gov/index.php?id=133>.





feel safer and improving academic performance. Implementation of a school-wide framework provides a **structure** for schools in which to customize and organize the varied practices and programs they need to provide to their students based on data on student needs and local resources. Further, such a framework may help schools to better identify **students struggling** with trauma post-event and select appropriate interventions to help them to recover.

For more information about a multi-tiered behavioral framework, visit the Technical Assistance Center on Positive Behavioral Interventions and Supports available at <http://www.pbis.org>.

□ Promote Social + Emotional Competencies

Social and emotional learning is important to enable individuals to learn to understand and manage their emotions and relationships, and to make **good decisions**. Social-emotional learning can help individuals stop and think before they react, control their response to stress, develop supportive and caring relationships, persist through challenge, seek help, and pay attention to theirs and others' needs and feelings. These and other social and emotional competencies help individuals **prepare** for and **respond** to emergencies. Students are more likely to develop such competencies when they have good relationships with adults, and when the adults model these competencies.

For more information about teaching social and emotional competencies, visit <http://safesupportivelearning.ed.gov>. For additional information on how social and emotional learning may be integrated into a multi-tiered framework, visit <http://www.pbis.org>.

Active Shooter Situations

Police officers, firefighters and emergency medical services (EMS) technicians who come to a school because of a 9-1-1 call involving **gunfire** face a daunting task. Though the objective remains the same – protect students and staff – the threat of an active shooter incident is **different** than responding to a natural disaster or many other emergencies.

Emergency calls can involve **actual** or **future threats** of **physical violence**. This violence might be directed not only in or at the school building, students, staff and campus but also at nearby buildings on or off school grounds.

Active shooter situations are defined²³ as those where an individual is “actively engaged in **killing** or **attempting** to kill people in a confined and populated area.” Unfortunately, schools face active shooter situations as well.²⁴

The better first responders and school personnel are able to **discern** these **threats** and **react swiftly**, the more lives can be saved. This is particularly true in an active shooter situation at a school where law enforcement responds to a 9-1-1 call of “shots fired”. Many young and innocent lives are at risk in such a concentrated space. This is why it is critical that **schools work** with first responders,

²³Other gun-related incidents that may occur in a school environment are not defined as active shooter incidents because they do not meet this definition. Instead, they may involve a single shot fired, accidental discharge of a weapon or incidents that are not ongoing.

²⁴U.S. Department of Homeland Security (DHS), *Active Shooter, How to Respond*. Washington, DC: Author, October 2008. Available at http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf.





emergency management staff, and all community partners to identify, prepare, prevent and effectively respond to an active shooter situation in a coordinated fashion.

Active shooter situations are **unpredictable** and **evolve quickly**. Because of this, individuals must be prepared to deal with an active shooter situation *before* law enforcement officers arrive on the scene.

Preparing For An Active Shooter Situation

□ Plan

As with any threat or hazard that is included in a school’s EOP, the planning team establishes goals, objectives and courses of action for an *Active Shooter Annex*. These plans are impacted by the assessments conducted at the outset of the planning process and updated as ongoing assessments occur. As courses of action are developed, the planning team considers a number of issues, including, but not limited to:

- How to **evacuate** or **lock down** students, staff and visitors, including those who are not with staff or in a classroom (e.g., in the hall, bathroom, break room). Personnel involved in such planning should pay attention to **disability-related accessibility** concerns when advising on shelter sites and evacuation routes.
- How to evacuate when the **primary evacuation** route is **unusable**.
- How to select **effective** shelter-in-place locations (**optimal locations** have thick walls, solid doors with locks, minimal interior windows, first-aid emergency kits, communication devices and duress alarms).
- How the school community is **notified** that there is an active shooter on school grounds. This can be done through the use of familiar terms, sounds, lights, and electronic communications such as text messages. Include in the courses of action how to communicate with those who have language barriers or need other accommodations, such as visual signals or alarms to advise deaf students, staff and parents about what is occurring. School wide “**reverse 9-1-1-style**” text messages sent to **predetermined** group distribution lists can be very helpful in this regard. **Posting** this protocol near locations where an all-school announcement can be broadcast (e.g., by the microphone used for the public announcement system) may save lives by *preventing* students and staff from stepping into harm’s way.
- How students and staff know when the building is **safe**.

The planning team may want to include functions in the *Active Shooter Annex* that are also addressed in other functional annexes. For example, **evacuation** is **different** during an active shooter situation than it for a fire.

Additional considerations are included in the *Responding to an Active Shooter* and *After an Active Shooter Incident* sections below.





□ Share Information With First Responders

Any planning process is not complete until the school EOP is **shared** with **first responders**.

This is equally true for active shooter planning. Sharing information includes site assessment information, building schematics, floor plans and other site-specific information discussed in detail on page 41.

Technology and tools with the same information (e.g., a **portable USB** drive that is compatible with computers used by first responders) should be maintained at the front of the school, in a lock box, or other secured location from which school officials can *immediately* provide it to responding officials or first responders can directly access it. The location of these materials at the school should be **known by** and **accessible** to a number of individuals to ensure ready access in an emergency. Every building should have more than one individual charged with meeting **first responders** to provide them with the **school site assessment**, the school EOP and any other details about school **safety** and the **facility**.²⁵ All parties should know who these key contacts are.

Exercises

Most schools **practice evacuation** drills for fires and protective measures for tornadoes, but far fewer schools practice for active shooter situations. To be prepared for an active shooter incident, *schools should train* staff, students and families, as appropriate, in what to expect and how to react. If students are involved, select the appropriate exercise considering the **ages** of the students. In a study of **84 active shooter** events that occurred between 2000 and 2010, **34 percent** involved **schools**.²⁶

Good planning includes conducting **drills**, which must include **first responders** and **school resource officers** (where applicable). Exercises with these valuable partners are one of the *most effective* and **efficient** ways to ensure that *everyone* knows not only his or her roles, but also the roles of others at the scene. These exercises should include **walks through** school buildings to allow law enforcement to provide input on shelter sites as well as familiarize first responders with the location.

Table 10: RESPONSIBILITY THRESHOLD

Each person carries a **threefold** responsibility.

- **First:** Learn the signs of a *potentially volatile situation* and ways to **prevent** an incident.
- **Second:** Learn the **best steps** for **survival** when faced with an active shooter situation.
- **Third:** Be prepared to work with **law enforcement** during the response.

²⁵See also, <http://www.ready.gov>.

²⁶J. Pete Blair with M. Hunter Martaindale, *United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, Texas: Texas State University, 2013. Available at <http://policeforum.org/library/critical-issues-in-policing-series/Blair-UnitedStatesActiveShooterEventsfrom2000to2010Report-Final.pdf>.





Preventing An Active Shooter Situation

□ Warning Signs

No profile exists for an active shooter; however, research indicates there may be **signs** or **indicators**. Schools should learn the signs of a *potentially volatile situation* that may develop into an active shooter situation and **proactively** seek ways to *prevent* an incident with internal resources or additional external assistance.

In 2002, the *Safe School Initiative* (SSI) was completed by the U.S. Department of Education and the U.S. Secret Service, examining **41 K–12 student attackers** involving **37 incidents** in the United States from **1973** through **May 2000**.²⁷ Research results, though focused on targeted school violence and not on active shooter situations, remain highly useful as a guide for law enforcement officials, educators and mental health practitioners.

The study identified **10 key findings** for the development of **strategies** to address targeted school violence:

- There is **no accurate** or **useful profile** of students who have engaged in targeted school violence.
- Incidents of targeted violence at school are *rarely sudden, impulsive acts*.
- Prior to most incidents, **other people knew** about the attacker’s idea and/or the plan to attack.
- Most attackers **did not** threaten their targets **directly prior** to advancing the attack.
- Most attackers engaged in some behavior *prior* to the incident that caused **others concern** or indicated a need for help.
- Most attackers had **difficulty coping** with **significant loss** or **personal failures**. Moreover, many had **considered** or **attempted suicide**.
- Many attackers felt **bullied, persecuted** or **injured** by others *prior* to the attack.
- Most attackers had access to and had used weapons prior to the attack.
- In many cases, **other students** were involved in some capacity.
- Despite prompt law enforcement officer responses, most shooting incidents were stopped by means **other than law enforcement intervention**.²⁸

²⁷Robert Fein, Bryan Vossekuil, William Pollack, Randy Borum, William Modzeleski, and Marisa Reddy, *Threat Assessment in Schools: A Guide to Managing Threatening Situations and to Creating Safe School Climates*. Washington, DC: U.S. Department of Education and U.S. Secret Service, 2004. Available at <http://www2.ed.gov/admins/lead/safety/threatassessmentguide.pdf>.

²⁸Bryan Vossekuil, Robert Fein, Marisa Reddy, Randy Borum, and William Modzeleski, *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. Washington, DC: U.S. Department of Education (DOE) and U.S. Secret Service, 2004. Available at <http://www2.ed.gov/admins/lead/safety/preventingattacksreport.pdf>.





By highlighting **common pre-attack behaviors** displayed by past offenders, Federal researchers sought to enhance the **detection** and **prevention** of tragic attacks of violence, including active shooting incidents. Several agencies within the Federal government continue to explore incidents of **targeted violence** in the effort to identify these potential “**warning signs.**”

- In **2002**, the FBI published a monograph on **workplace violence**, including problematic behaviors of concern that may telegraph violent ideations and plans.²⁹ In **2007**, the U.S. Secret Service, U.S. Department of Education, and the FBI collaborated to produce the report *Campus Attacks, Targeted Violence Affecting Institutions of Higher Learning*, which examined lethal or attempted lethal attacks at U.S. universities and colleges from **1900 to 2008**. The report was published in **2010**, and featured **several key observations** related to pre-attack behaviors, including the following:
- In only **13 percent** of the cases did subjects make **verbal** and/or **written threats** to cause harm to the target. These threats were *both* veiled and direct, and were conveyed to the target or to a third party about the target.
- In **19 percent** of the cases, **stalking** or **harassing** behavior was reported *prior* to the attack. These behaviors occurred within the context of a current or former romantic relationship, or in academic and other non-romantic settings. They took on various forms, including written communications (conventional and electronic), telephonic contact, and harassment of the target and/or the target’s friends and/or family. Subjects also **followed, visited** or **damaged** property belonging to target(s) or their families *prior* to the attack.
- In *only* **10 percent** of the cases did the subject engage in **physically aggressive acts** toward the targets. These behaviors took the form of physical assaults, menacing actions with weapons or repeated physical violence to intimate partners.
- Concerning behaviors **observed** by friends, family, associates, professors or law enforcement officers in **31 percent** of the cases. These behaviors included, but were not limited to paranoid ideas, delusional statements, changes in personality or performance, disciplinary problems on campus, depressed mood, suicidal ideation, non-specific threats of violence, increased isolation, “odd” or “bizarre” behavior and interest in or **acquisition of weapons**.

Specialized units in the Federal government (such as the FBI’s Behavioral Analysis Unit) *continue* to support **behaviorally based operational assessments** of persons of concern in a variety of settings (e.g., schools,

workplaces, places of worship) who appear to be on a trajectory toward a violent act. A review of current research, **threat assessment literature**, and active shooting incidents, combined with the extensive case experience of the Behavioral Analysis Unit, suggest that there are observable pre-attack behaviors, which, if **recognized**, can lead to the **disruption** of a planned attack.³⁰ While checklists of

ACTIVE SHOOTER KNOW WHAT TO LOOK FOR

²⁹U.S. Department of Justice (DOJ) FBI Academy, *Workplace Violence: Issues in Response*. Quantico, Va.: Author, 2002. Available at <http://www.fbi.gov/stats-services/publications/workplace-violence>.

³⁰See Frederick Calhoun and Stephen Weston, *Contemporary Threat Management: A Practical Guide for Identifying, Assessing, and Managing Individuals of Violent Intent* (San Diego, CA: Specialized Training Services, 2003); Gene Deisinger, Marisa Randazzo, Daniel O’Neill, and Jenna Savage, *The Handbook for Campus Threat Assessment and Management Teams*





various warning signs are often of limited use in isolation, there are some behavioral indicators that should prompt further exploration and **attention** from law enforcement officers and/or school safety stakeholders. These behaviors often include

- Development of a **personal grievance**.
- Contextually **inappropriate** and recent **acquisitions of multiple weapons**.
- Contextually **inappropriate** and recent **escalation** in target practice and **weapons training**.
- Contextually **inappropriate** and recent **interest in explosives**.
- Contextually **inappropriate** and **intense** interest or fascination with *previous shootings or mass attacks*.
- Experience of a significant real or perceived **personal loss** in the weeks and/or months leading up to the attack, such as a death, breakup, divorce or loss of a job.
- **Few offenders had previous arrests for violent crimes**.

Threat Assessment Teams (TATs)

As described in the previous section, research shows that perpetrators of targeted acts of violence engage in both **covert** and **overt behaviors** *preceding* their attacks. They consider, plan, prepare, share and, in some cases, move on to action.³¹

The TAT serves as a **central convening body**, so that warning signs observed by multiple people are not considered isolated incidents that slip through the cracks, when they actually may represent **escalating behavior** that is a serious concern. School districts should keep in mind, however, the importance of relying on **factual information** (including observed behavior) and *avoid unfair labeling or stereotyping* of students, to remain in compliance with civil rights and other applicable State and Federal laws. One of the most useful tools a school can develop to identify, evaluate and address these troubling signs is of a **multidisciplinary school TAT**.

A TAT with **diverse** representation often operates more efficiently and effectively. TAT members should include **school principals, counselors, employees, medical** and mental health professionals, **law enforcement personnel** and **school resource officers**, where applicable.

For the purposes of consistency and efficiency, a school TAT is developed and implemented in coordination with school district policy and practice. In addition, staff already working to identify student needs can be a critical source of information about troubling student behavior for a TAT.

(Stoneham, MA: Applied Risk Management, 2008); Robert Fein, Bryan Vossekuil, and Gwen Holden, *Threat Assessment: An Approach to Prevent Targeted Violence* (Washington, DC: U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, 1995); John Monahan, Henry Steadman, Eric Silver, Paul Appelbaum, Pamela Robbins, Edward Mulvey, Loren Roth, Thomas Grisso, and Steven Banks, *Rethinking Risk Assessment: The MacArthur Study of Mental Disorder and Violence* (New York, NY: Oxford University Press, 2001); Bryan Vossekuil, Robert Fein, Marisa Reddy, Randy Borum, and William Modzeleski, *The Final Report and Findings of the Safe School Initiative: Implications for the Prevention of School Attacks in the United States*. (Washington D.C.: U.S. Department of Education (DOE) and U.S. Secret Service, 2004).

³¹See <http://www.fbi.gov/stats-services/publications/law-enforcement-bulletin/february-2010/threat-assessment-teams>.





The TAT reviews **troubling or threatening behavior** of current or former students, parents, school employees or other persons brought to its attention. The TAT contemplates a **holistic assessment** and management strategy that considers the many aspects of the person's life — academic, residential, work and social. More than focusing on warning signs or threats alone, the TAT assessment involves a unique **overall analysis** of *changing* and **relevant behaviors**.

- The TAT takes into consideration, as appropriate, information about classroom behaviors, various kinds of communications, not-yet substantiated information, any threats made, security concerns, parenting issues, or relationship problems that might involve a troubled individual.

The TAT may also identify any **potential victims** with whom the individual may interact. Once the TAT identifies an individual that may pose a threat, the team will identify a **course of action** for addressing the situation. The appropriate course of action — whether law enforcement intervention, counseling, or other action — will depend on the **specifics** of the situation.

Although not as common as in the K–12 environment, TATs are *increasingly* common in **university settings**, pushed to the forefront of concern following the **2007** shooting at Virginia Polytechnic Institute and State University in Blacksburg, Va., where **32 individuals** were killed. In some cases, State funding **mandates** that colleges and universities create *threat assessment teams (TATs)*.³²

Even in a K–12 setting, where a designated TAT may not have been established, area **law enforcement officials** help assess **reported threats** or **troubling behavior**, and reach out to available Federal resources. The **FBI's behavioral experts** in its National Center for the Analysis of Violent Crimes (NCAVC) at Quantico, Va., are available on a **24/7 basis** to *join* in any **threat assessment analysis** and develop **threat mitigation strategies** for persons of concern. **The law enforcement member of the school TAT should contact the local FBI office for this behavioral analysis assistance.**

Each FBI **field office** has a NCAVC representative available to work with school TATs and coordinate access to the FBI's Behavioral Analysis Unit (BAU), home to the NCAVC. Their focus is not on how to respond tactically to an active shooter situation but rather on how to *prevent* one. **Early intervention** can prevent a situation from escalating by **identifying, assessing** and **managing** the threat. The TAT should consult with its district and develop a process to seek these additional resources.

Generally, active shooter situations are not motivated by **other criminal-related concerns**, such as monetary gain or gang affiliation. Often, situations may be prevented by identifying, assessing and managing potential threats. Recognizing these pre-attack warning signs and indicators might help disrupt a potentially tragic event.

³²See *Recommended Practices for Virginia Colleges Threat Assessments* at http://www.threatassessment.vt.edu/resources/tat_info/VArecommended_practices.pdf.





Responding To An Active Shooter Situation

School EOPs should include courses of action that describe **how** students and staff can most effectively respond to an active shooter situation to *minimize* the loss of life, and **teach** and **train** on these practices, as deemed appropriate by the school.

Law enforcement officers may not be present when a shooting begins. The first law enforcement officers on the scene may arrive *after* the shooting has ended. Making sure staff know how to respond and instruct their students can help *prevent* and *reduce* the **loss of life**.

No single response fits all active shooter situations; however, making sure each individual knows his or her **options** for response and can **react decisively** saves valuable time. Depicting **scenarios** and **considering response options** in *advance* assists individuals and groups in quickly selecting their best course of action.

Understandably, this is a sensitive topic. There is no single answer for what to do, but a **survival mindset** can increase the odds of surviving. As appropriate for your community, it may be valuable to schedule a time for an **open conversation** regarding this topic. Though some parents or personnel may find the conversation uncomfortable, they may also find it reassuring to know that, as a whole, their school is thinking about how best to deal with this situation.

During an active shooter situation, the natural human reaction, even if you are highly trained, is to be **startled**, **feel fear** and **anxiety**, and even experience **initial disbelief** and **denial**. You can expect to hear noise from alarms, gunfire and explosions, and people shouting and screaming. Training provides the means to **regain** your composure, **recall** at least some of what you have learned and **commit** to action.

There are **three (3) basic options: run, hide or fight**. More recently, this is talked about as **evacuate, hide out or take action against the shooter**. You can run away from the shooter, seek a secure place where you can hide and/or deny the shooter access, or incapacitate the shooter to survive and protect others from harm.

As the situation develops, it is possible that students and staff will need to use more **than one option**. During an active shooter situation, staff rarely has *all* of the information they need to make a fully informed decision about which option is best. While they should follow the plan and any instructions given during an incident, often they will have to rely on their **own judgment** to decide which option will best protect lives.³³

□ Respond Immediately

It is not uncommon for people confronted with a threat to *first deny* the possible danger rather than respond. An investigation by the National Institute of Standards and Technology (2005) into the collapse of the World Trade Center towers on 9/11 found that people close to the floors impacted

³³As part of its preparedness mission, *Ready Houston* produces “Run, Hide, Fight” videos, handouts and trainings to promote preparedness among residents of the Houston region. These materials are not specific to a school setting but may still be helpful. These videos are not recommended for viewing by minors. All of these items are available free of charge, and many are available at <http://www.readyhouston.gov/videos.html>.





waited *longer* to start **evacuating** than those on unaffected floors.³⁴ Similarly, during the Virginia Tech shooting, individuals on campus responded to the shooting with varying degrees of **urgency**.³⁵

Train staff to overcome denial and to **respond immediately**, including fulfilling their responsibilities for individuals in their charge. For example, train staff to **recognize** the sounds of danger, act and forcefully communicate the danger and necessary action (e.g., “Gun! Get out!”) to those in their charge. In addition, those closest to the **public address** or other communications system, or otherwise able to alert others, should communicate the danger and necessary action. **Repetition** in training and preparedness *shortens* the time it takes to **orient, observe and act**. These studies highlight this delayed response or denial. For example, some people report hearing firecrackers when in fact they heard gunfire.

Upon recognizing the danger, as soon as it is safe to do so, staff or others must **alert responders** by contacting 9-1-1 with as clear and accurate information as possible.

□ Evacuate (Run)

If it is safe to do so for yourself and those in your care, the first course of action that should be taken is to **evacuate** of the building and get far away until you are in a **safe location**.

Students and staff should be trained to:

- **Leave** personal belongings behind.
- Visualize possible **escape routes**, including physically accessible routes for students and staff with disabilities as well as persons with access and functional needs.
- Avoid **escalators** and **elevators**.
- **Take others** with them, but not to stay behind because others will not go.
- Call **9-1-1** when safe to do so.
- Let a responsible adult know where they are.

□ Hide Out (Hide)

If running is not a safe option, **hide out** in as safe a place as possible.

Students and staff should be trained to hide in a location where the **walls** might be **thicker** and have **fewer windows**. In addition:

³⁴Occupants of both towers delayed initiating their evacuation after World Trade Center 1 was hit. In World Trade Center 1, the median time to initiate evacuation was **three (3) minutes** for occupants from the ground floor to floor 76, and **five (5) minutes** for occupants near the impact region (floors 77 to 91). See National Institute of Standards and Technology, 2005. *Federal Building and Fire Safety Investigation of the World Trade Center Disaster Occupant Behavior, Egress, and Emergency Communications*. Available at <http://www.mingerfoundation.org/downloads/mobility/nist%20world%20trade%20center.pdf>.

³⁵*Report of the Virginia Tech Review Team*, available at <http://www.governor.virginia.gov/tempContent/techPanelReport-docs/FullReport.pdf> and <http://www.governor.virginia.gov/tempContent/techPanelReport-docs/12%20CHAPTER%20VIII%20MASS%20MURDER%20AT%20NORRIS%20HALL.pdf>.





- **Lock** the doors.
- **Barricade** the doors with heavy furniture.
- **Close** and **lock windows** and close blinds or cover windows.
- **Turn off lights**.
- Silence all **electronic devices**.
- Remain **silent**.
- Hide along the **wall closest** to the exit but out of the view from the hallway (allowing for an ambush of the shooter and for possible escape if the shooter enters the room).
- Use strategies to **silently communicate** with first responders if possible. For example, in rooms with exterior windows make signs to silently signal law enforcement officers and emergency responders to indicate the status of the room's occupants.
- **Remain in place** until given an **all clear by** identifiable law enforcement officers.

□ Take Action Against Shooter (Fight)

If neither running nor hiding is a safe option, as a **last resort** when confronted by the shooter, adults in immediate danger should consider trying to **disrupt** or **incapacitate** the shooter by using **aggressive force** and items in their environment, such as fire extinguishers and chairs. In a study of **41 active shooter** events that ended *before* law enforcement officers arrived, the potential victims stopped the attacker themselves in **16 instances**. In **13** of those cases they **physically subdued** the attacker.³⁶

While talking to staff about confronting a shooter may be daunting and upsetting for some, they should know that they might be able to successfully **take action** to save lives. To be clear, **confronting** an active shooter should *never* be a requirement in any school employee's job description; how each staff member chooses to respond if directly confronted by an active shooter is up to him or her. Further, the possibility of an *active shooter situation* is not justification for the presence of **firearms** on campus in the hands of any personnel other than law enforcement officers.

Know What To Expect When Interacting With First Responders

Staff should be trained to understand and expect that a law enforcement officer's *first priority* must be to **locate** and **stop** the person(s) believed to be the shooter(s); all other actions are secondary. One comprehensive study determined that *more* than half of mass-shooting incidents — **57 percent** — still were under way when the first officer arrived; in **75 percent** of those instances that solo officer had to confront the perpetrator to end the threat. In those cases, the officer was shot one-third of the time.³⁷

³⁶J. Pete Blair with M. Hunter Martaindale, *United States Active Shooter Events from 2000 to 2010: Training and Equipment Implications*. San Marcos, Texas: Texas State University, 2013. Available at <http://policeforum.org/library/critical-issues-in-policing-series/BlairUnitedStatesActiveShooterEventsfrom2000to2010Report-Final.pdf>.

³⁷Ibid.





Students and staff should be trained to **cooperate** and not to **interfere** with first responders. When law enforcement officer(s) arrives, students and staff must display **empty hands** with **open palms**. Law enforcement may instruct everyone to place their hands on their heads, or they may search individuals.

After An Active Shooter Incident³⁸

Once the scene is **secured**, first responders work with school officials and victims on a variety of matters. This will include **transporting** the injured, **interviewing** witnesses and initiating the **investigation**.

The school EOP identifies **trained personnel** who provide assistance to victims and their families. This includes establishing an **incident response team** (including local first responders and other community partners) that is trained to appropriately assess and triage an active shooter situation (as well as other emergencies), and provide **emergency intervention** services and victim assistance beginning *immediately* after the incident and throughout the recovery efforts. This team will **integrate** with State and Federal resources when an emergency occurs.

Within an ongoing and/or evolving emergency, where the immediate reunification of loved ones is not possible, providing **family members** with timely, accurate and relevant information is paramount. Having family members wait for long periods of time for information about their loved ones not only adds to their stress and frustration but also *escalates* the **emotions** of the entire group. When families are reunited, it is critical that there be **child release processes** in place to ensure that no child is released to an unauthorized person, even if that person is well-meaning.

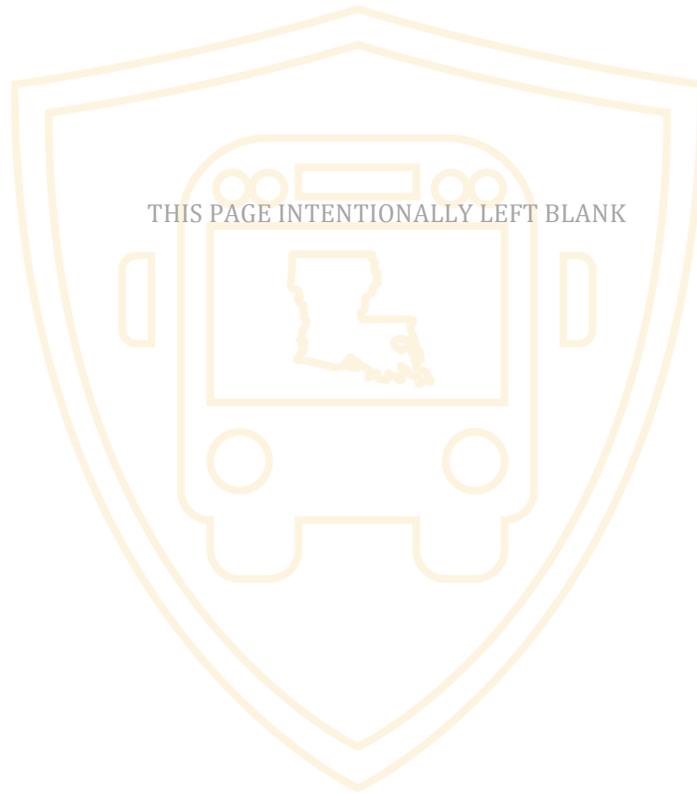
Essential steps to help **establish trust** and provide family members with a sense of control include:

- Identifying a **safe location** separate from distractions and/or media and the general public, but close enough to allow family members to feel connected in proximity to their children and their loved ones.
- Scheduling **periodic updates** even if no additional information is available.
- Being prepared to speak with family members about **what to expect** when **reunified** with their child and their loved ones.
- Ensuring **effective communication** with those who have language barriers or need other accommodations, such as sign language interpreters for deaf family members.

When **reunification** is not possible because a child is **missing, injured, or killed**, how and when this information is provided to families is critical. See page 50 for a detailed discussion on family notification of missing and injured, or children who have recently been killed.

³⁸Also see the *Functional Annexes Content* and *Recovery Annex* sections of this Guide.







Appendix A: Evacuation Plan

I. Purpose

Evacuation should take place if it is determined that it is safer **outside** than inside the building (fire, explosion, intruder, hazardous material spill) and staff, students and visitors can safely reach the evacuation location **without danger** (playground, football stadium, or off-site location in the community).

Individuals with disabilities who are **self-sufficient** under normal circumstances may have to rely on the help of others in an emergency. The quick, safe and efficient evacuation of an entire school during an emergency can only be accomplished through careful **planning** and **preparation**. When planning and implementing your building's *Emergency Evacuation Plan*, incorporate the following **suggested** procedures to address any special needs of disabled individuals.

II. Responsibilities

Designated staff members, including teachers and bus drivers, participate in the **development**, **implementation** and **evaluation** of this procedure.

III. Procedures

A. Actions To Take Prior To Emergency Situations

At the beginning of each school year, each school administration should compile a **list** of those **disabled individuals** who may require assistance in evacuating the building. Update this list at least monthly to reflect any changes that occur during the school year.

- Compile a list of **all students** and **employees** with disabilities that might affect their ability to evacuate safely.
- Prepare **schedules** and classroom **assignments** that locate individuals with mobility impairments in areas closest to an accessible exit or an area of rescue assistance. Institute other scheduling changes that will increase the safety of evacuations.
- Develop a **master schedule** showing the location(s) of those disabled students and employees who require evacuation assistance.

Each school should maintain a master schedule showing the assigned locations of all persons with disabilities who require assistance to evacuate the building. Mark the locations of each affected student and employee on a floor plan diagram. **Update** this schedule to reflect any changes that occur during the course of the year. This schedule should be **maintained** in the main office or at any other assigned locations for emergency preparedness records.





1. Determine Special Needs

Determine what assistance, if any, each disabled individual may require to safely evacuate the building. When determining the most effective methods of evacuation, consideration should be given to the **size** and **weight** of the individual, **distance** required to reach the assembly area, and **obstacles** such as steps, curbs, streets, intersections, traffic, etc.

- Determine the **number of people** needed to provide the necessary assistance for every disabled individual.
- Determine any **special medical needs** that students and employees may require. Determine if any special equipment or apparatus must accompany the students or employees when evacuated from the building. Compile a list of these special needs and update it as necessary.
- Inform **staff members** of their **responsibilities**.
- Inform staff members of their responsibilities for **assisting** with the evacuation of **disabled individuals**. Consider the nature and degree of the disabling condition when determining the most appropriate assisting staff members.

For students—In an emergency, the responsibility for assisting the disabled student should be assigned to the **teacher** or **person in charge** of the student at that time. As the student changes locations throughout the school day, responsibility will shift to the next person in charge of the student. School administrators and/or the school nurse may also be appropriate staff members to assist in evacuations.

For employees—Responsibility for providing evacuation assistance for a disabled employee should be assigned to the **staff member** who works closest to the employee. Again, this responsibility will shift as the employee works in different locations of the building throughout the day.

For visitors—Responsibility for providing evacuation assistance to visitors should be assigned to staff members already assigned the duty of **checking areas** of the building (such as lavatories) to make sure that all areas are clear during an emergency. Given unpredictable visitors, those assisting them may not be able to evacuate them on their own. In such cases, the staff member should assist the visitor to an Area of Rescue Assistance and seek assistance from other staff members or from professional rescue personnel.

- Assign an administrative staff member to inform any **emergency responders** (fire fighters, police, etc.) of the **number, identity** and **locations** of any disabled individuals who could not be evacuated from the building and/or those who require special medical attention. Representatives of the school and emergency responders should meet at a prearranged location.
- Assign **backup staff members** for each of these responsibilities.





2. Practice Emergency Evacuation Procedures

When conducting **monthly evacuation drills**, incorporate all aspects of your evacuation plan for the disabled in at least during **two (2)** drills a year.

During these drills, it may *not* be advisable to evacuate all disabled persons from the building. In certain cases, the potential **risk of injury** may outweigh the **benefits** of conducting the drill. Discuss these health or safety concerns with local fire department representatives. Under these special circumstances, during drills only evacuate those individuals to the appropriate designated **Areas of Rescue Assistance**.

- Evaluate the **effectiveness** of each evacuation drill. Include all students and staff members involved in using the disabled evacuation procedures. Make adjustments and recommend necessary changes to the established procedures in consultation with the appropriate crisis agencies.
- Discuss** and **review** this evacuation procedure **frequently** with all staff members.
- Review and **update** your building's evacuation plan.
- Keep your plan **current** to reflect changes in your building that might impact on the safe evacuation of your building. At minimum, building administrators must **review** and **update** their building's evacuation plan on an **annual basis**.

A. Actions To Take During Emergency Situations

1. School Incident Commander/Principal

- Call** or **designate** another to immediately call **public safety** (9-1-1) (police, fire and emergency responders) to give notice the school has been evacuated.
- Notify appropriate **district staff** that an evacuation of the school has occurred.
- Communicate the need to evacuate the building or a specific area of the building to the building staff and other occupants by activating the **fire alarm** or by a **public address system** or bullhorn. Make the following announcement:

*YOUR ATTENTION, PLEASE. WE NEED TO EVACUATE THE BUILDING.
TEACHERS ARE TO TAKE THEIR STUDENTS TO THEIR DESIGNATED ASSEMBLY AREA.
TEACHERS, TAKE YOUR CLASS ROSTER AND
TAKE A HEADCOUNT AT THE ASSEMBLY AREA.*

- Determine **evacuation routes** based on location of the incident and type of emergency.





- Communicate **changes** in evacuation routes based on location and type of emergency.
- Designate staff with assigned **radios** and/or **cell phones** to assist in evacuation procedures.
- Monitor** the situation and provide updates and additional instructions as needed.
- During **inclement weather**, consider requesting buses for sheltering students.
- Communicate when it is **safe** to **re-enter** the building or **re-occupy** a section of the school by bell system, radio transmission, public address system, designated staff or bullhorn.

2. Teachers + Staff

- Instruct students to **exit** the building using the designated emergency exit routes or as directed by the school incident commander/principal. Emergency exit routes should be diagramed on the school floor plan drawing posted near the light switch inside each room.
- Use a **secondary route** if the primary route is blocked or hazardous. Exit routes and the location of the inside the building evacuation location will be selected and communicated by the school incident commander/principal at the time of the emergency and the evacuation.
- Help those needing **special assistance**.
- Do not lock** classroom doors when leaving, close door and turn off lights. Do not stop for **student** or **staff belongings**.
- Take **class roster, phone lists, first-aid kit and other emergency supplies** with you.
- Check the **bathrooms, hallways and common areas** for visitors, staff or students while exiting.
- Go to **designated evacuation assembly area** (*minimum of 50 feet from building is required in fire evacuation and 1000 feet from building for bomb threat, chemical spill inside building or other directed evacuations*).
- When outside the building or inside the building evacuation location, **check for injuries**.
- Account for all students**. Immediately report any missing or injured students to the school incident commander/principal.
- Wait for **additional instructions**.

3. Office Staff

- Take **visitor log** and **student sign-out sheet** to evacuation assembly area.
- Gather **headcount** information from teachers and inform the **school incident commander/principal**.

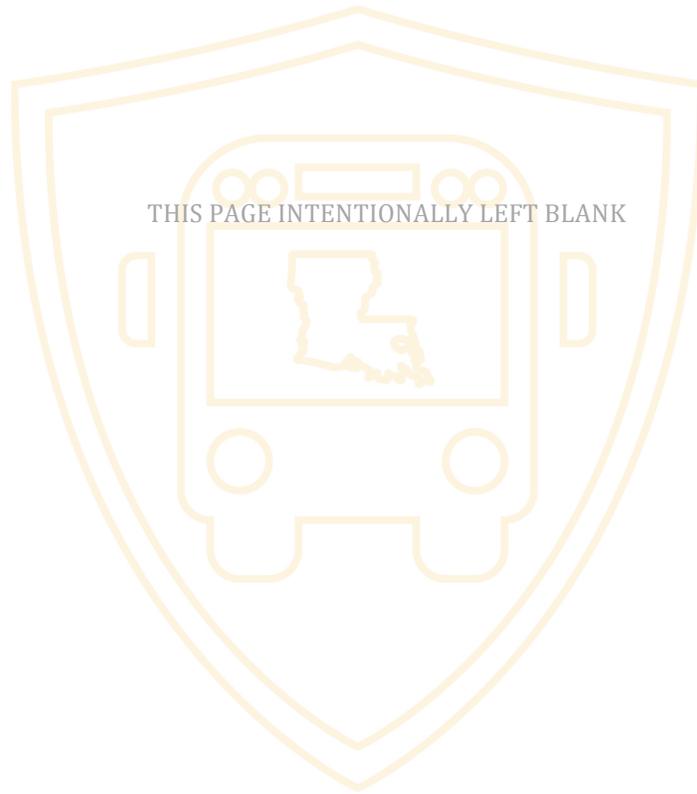




4. Executing Emergency Evacuation Procedures

- Never use **elevators, chair lifts** or any other system requiring **electrical power** in an emergency.
- In most cases, **delay** exiting persons with disabilities until the exit route is **clear of traffic**. This is for the disabled person's safety as well as for the safety of others. For example, where a person will be carried down sets of stairs, it is much safer to wait until the stairs are free of quicker moving traffic.
- Ensure that appropriate staff members **account for all individuals** with disabilities immediately after notification that an emergency exists. Inform the appropriate administrator immediately of anyone who cannot be accounted for.
- Ensure that appropriate staff members **assist** individuals with disabilities in moving to their predetermined **Areas of Rescue Assistance** and assist them in **exiting** the building.
- Ensure that appropriate staff members assisting individuals with disabilities **remain** with them until the emergency is over.
- Upon arrival of emergency responders, ensure that an administrative staff member meets with them at a **prearranged location** with information on number, identity and locations of individuals with disabilities who are still in the building. Also, provide a **copy** of the list that describes any special medical needs that students or employees may have as well as any special equipment or apparatus that may be needed.







Appendix B: School EOP Development Checklist

Activity – Planning Process	Date Activity Completed
Step 1: Form A Collaborative Planning Team	
1. Identify Core Planning Team	
2. Form A Common Framework	
3. Define + Assign Roles + Responsibilities	
4. Determine A Regular Schedule Of Meetings	
Step 2: Understand The Situation	
1. Identify Threats + Hazards	
2. Assess Risk	
a. Site Assessment	
b. Culture and Climate Assessment	
c. School Threat Assessment	
d. Capacity Assessment	
3. Prioritize Threats + Hazards	
Step 3: Determine Goals + Objectives	
1. Develop Goals	
2. Develop Objectives	
Step 4: Plan Development (Identifying Courses Of Action)	
1. Identify Courses Of Action	
a. Depict the scenario	
b. Determine the amount of time available to respond	
c. Identify decision points	
d. Develop courses of action	
2. Select Courses Of Action	
3. Does Plan Comply With:	
a. <i>Americans With Disabilities Act (ADA)?</i>	
b. <i>Family Educational And Rights Privacy Act (FERPA)</i>	
c. <i>Health Insurance Portability And Accountability Act Of 1996 (HIPAA)</i>	





Step 5: Plan Preparation + Review + Approval	
1. Format The Plan	
2. Write The Plan	
3. Review The Plan	
4. Approve + Share The Plan	
Step 6: Plan Implementation + Maintenance	
1. Train Stakeholders	
a. Hold A Meeting	
b. Visit Evacuation Sites	
c. Give Involved Parties Appropriate And Relevant Literature On The Plan, Policies And Procedures	
d. Post Key Information Throughout The Building	
e. Familiarize Students And Staff With The Plan And Community Partners	
f. Train Staff On The Necessary Skills To Fulfill Their Roles	
2. Exercise The Plan	
a. TableTop Exercises	
b. Drills	
c. Functional Exercises	
d. Full-scale Exercises	
3. Review + Revise + Maintain The Plan	
Activity - Plan Content (Basic Plan)	
1. Introductory Material	
a. Cover Page	
b. Promulgation and Documenter Signature Page	
c. Approval and Implementation Page	
d. Record Of Changes	
e. Record Of Distribution	
f. Table Of Contents (TOC)	
g. Campus and Building Information (Maps, Plans, Etc)	
h. School Population	
2. Purpose + Situation Overview	
3. Concept Of Operations (CONOPs)	
4. Organization + Assignment Of Responsibilities	
5. Direction + Control + Coordination	
6. Information Collection + Analysis + Dissemination	
7. Training + Exercises	





8. Administration + Finance + Logistics	
9. Plan Development + Maintenance	
10. Authorities + References	
Activity – Functional Annexes Content	
1. <i>Evacuation Annex</i>	
2. <i>Lockdown Annex</i>	
3. <i>Shelter-In-Place Annex</i>	
4. <i>Accounting For All Persons Annex</i>	
5. <i>Communications + Warning Annex</i>	
6. <i>Family Reunification Annex</i>	
7. <i>Continuity Of Operations (COOP) Annex</i>	
8. <i>Recovery Annex</i>	
a. Academic recovery	
b. Physical recovery	
c. Fiscal recovery	
d. Psychological and emotional recovery	
9. <i>Public Health + Medical + Mental Health Annex</i>	
10. <i>Security Annex</i>	
11. Other	
Activity – Threat + Hazard Specific Annexes	
1. Natural Hazards	
2. Technological Hazards	
3. Biological Hazards	
4. Adversarial + Incidental + Human-caused Threats	
5. Other	
Activity – A Closer Look	
1. Information Sharing	
a. <i>Family Educational Rights and Privacy Act (FERPA)</i>	
b. <i>Health Insurance Portability and Accountability Act (HIPAA)</i>	
2. Psychological First Aid For Schools (PFA-S)	
3. School Climate + Emergencies	
a. Conduct A Comprehensive Needs Assessment	
b. Use Multi-Tiered Interventions + Supports	
c. Promote Social + Emotional Competencies	
4. Active Shooter Situations	
a. Preparing For + Active Shooter Situation	
i. Plan	
ii. Share Information With First Responders	





b. Exercises	
c. Preventing + Active Shooter Situation	
d. Threat Assessment Teams (TATs)	
e. Responding To An Active Shooter Situation	
i. Respond Immediately	
ii. Evacuate (Run)	
iii. Hide Out (Hide)	
iv. Take Action Against Shooter (Fight)	
f. Interacting With First Responders	
g. After An Active Shooter Incident	





Appendix C: High-Quality EOP **FINAL** Plan Review Checklist + CrossWalk

SCHOOL _____

ADDRESS _____

SCHOOL POINT OF CONTACT (POC) _____

POC PHONE _____ CELL _____

POC EMAIL _____

ITEMS TO INCLUDE	[SCHOOL NAME] EOP	PAGE #
Plan Content		
<ul style="list-style-type: none"> • Cover Page 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Promulgation Document Signature Page 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Approval + Implementation Page 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Record of Changes 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Record of Distribution (including school personnel and community partners) 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Schematics <ul style="list-style-type: none"> <li style="width: 50%;">○ Campus Map <li style="width: 50%;">○ Fire Hydrants <li style="width: 50%;">○ Floor Plans <li style="width: 50%;">○ Fire Extinguishers <li style="width: 50%;">○ Annotated Evacuation Routes <li style="width: 50%;">○ First-aid Kits <li style="width: 50%;">○ Shelter Locations <li style="width: 50%;">○ Hazardous Materials Storage <li style="width: 50%;">○ Fire Alarm Pull Stations <li style="width: 50%;">○ Utility Shutoffs 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Enrollment Data <ul style="list-style-type: none"> ○ Total Population ○ Special Needs Populations ○ Instructional Assistants 	<input type="checkbox"/>	





<ul style="list-style-type: none"> ○ Administration ○ Teachers + Specialists ○ Office + Support Staff 	<ul style="list-style-type: none"> ○ Cafeteria Workers ○ Maintenance + Custodial Staff ○ Other (specify) 		
<ul style="list-style-type: none"> • <i>Americans with Disabilities Act (ADA) Access Statement of Compliance</i> 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • <i>Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA) Statements of Compliance</i> 		<input type="checkbox"/>	
Basic Plan			
<ul style="list-style-type: none"> • Table of Contents (TOC) 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Purpose + Situation Overview <ul style="list-style-type: none"> ○ Risk Assessment Worksheet 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Concept of Operations (CONOPs) (including who has authority to activate the plan) 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Organization + Assignment Responsibilities (including memorandums of understanding [MOUs]) 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Direction + Control + Coordination <ul style="list-style-type: none"> ○ ICS Structure Used ○ Who has Control of Equipment, Resources and Supplies ○ Relationship between School EOP and District and/or Parish EOP 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Information Collection + Analysis + Dissemination <ul style="list-style-type: none"> ○ Communications Plan 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Training + Exercise Plan/Schedule 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Administration + Finance + Logistics 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Plan Development + Maintenance 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Authorities + References 		<input type="checkbox"/>	
Functional Annexes			
<p>NOTE: Individual school EOPs may have <i>more, less and/or different</i> annexes than shown here. Annexes are customized to the needs of the school.</p>			
<ul style="list-style-type: none"> • Accounting For All Persons 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Communications + Warnings 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • COOP 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Evacuation 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Family Reunification 		<input type="checkbox"/>	
<ul style="list-style-type: none"> • Lockdown 		<input type="checkbox"/>	





<ul style="list-style-type: none"> • Public Health + Medical + Mental Health <ul style="list-style-type: none"> ○ Psychological First Aid for Schools (PFA-S) 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Recovery 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Security 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Shelter-in-Place 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Other(s) – Please Specify 	<input type="checkbox"/>	
Threat- + Hazard- Specific Annexes		
<ul style="list-style-type: none"> • Natural Hazards <ul style="list-style-type: none"> ○ Earthquake ○ Tornado ○ Lightning ○ Severe Wind ○ Hurricane ○ Flood ○ Wildfires ○ Extreme Temperature ○ Landslides or Mudslide ○ Tsunami ○ Volcanic Eruption ○ Winter Precipitation 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Technological Hazards <ul style="list-style-type: none"> ○ Explosions or Accidental Release of Toxins From an Industrial Plant ○ Accidental Release of Hazardous Materials within the School ○ Hazardous Materials Releases from Major Highways or Railroads ○ Industrial Plant or Other External Source ○ Radiological Release from Nuclear Power Stations ○ Dam Failure ○ Power Failure ○ Water Failure 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Biological Hazards <ul style="list-style-type: none"> ○ Infectious Diseases ○ Contaminated Food Outbreaks ○ Toxic Materials in School Labs 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Adversarial Incidental + Human-caused Threats <ul style="list-style-type: none"> ○ Active Shooter ○ Bomb Threats ○ Cyber Attacks ○ Domestic Violence or Abuse ○ Hostage Situation ○ Suspicious Package ○ Report of weapon(s) ○ Fire ○ Criminal Threats or Actions ○ Gang Violence ○ Suicide 	<input type="checkbox"/>	
<ul style="list-style-type: none"> • Other(s) – Please Specify 	<input type="checkbox"/>	

Although not required by State or Federal law, it is recommended as a best practice for the school superintendent to review the school EOP with the Parish OHSEP Director.

Superintendent

OHSEP Director

Date of Review

Date of Review



